CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
INDUSTRIAL WASTE CONTROL DIVISION

303 S. LIVERNOIS AVENUE
DETROIT, MICHIGAN 48209
PHONE 313•297•9400
FAX 313•297•9429

CERTIFIED MAIL

April 26, 1999

Mr. Gary Berndt
Sybill, Inc., d/b/a SRS Environmental
111 Military
Detroit, Michigan 48209

Dear Mr. Berndt:

Re: Wastewater Discharge Permit No. 914-003

Enclosed please find your Wastewater Discharge Permit as issued by the Detroit Water and Sewerage Department (DWSD). The terms and conditions of this permit are based on applicable law, data and other related information your company has submitted to the Industrial Waste Control (IWC) Division.

This permit contains the specific discharge limitations, effective dates, self-monitoring and reporting requirements for your facility to comply. Please note that any and all penalties, pretreatment schedules, compliance agreements, and/or Administrative Orders previously imposed as a consequence of violations by the industrial user, prior to the issuance of this permit, remain in full force and effect.

In accordance with City of Detroit, Ordinance No. 34-96, or equivalent local ordinance, any appeal regarding this permit must be submitted in writing within twenty (20) days from the date of mailing of this permit.

If you have questions, please contact , of the IWC Permits Section, at Mr. Yogendra Kumar (313) 297-5870.

3 TEX - FOG - PA - WEEKLY
> 2 WEEKS ALL
> 72 HOUR HOLIDAY NOTICE
> JUNE 30TH BULKHEAD
> MONTHLY
> MARCH 31 UP DATED REPORT

Sincerely,

Kathleen Leavey
Deputy Director

KL/YK/vb

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WASTEWATER DISCHARGE PERMIT
PERMIT NO. 914-003

SECTION A: GENERAL INFORMATION

Facility I.D. No.: 083901

Company Name: Sybill, Inc., d/b/a SRS Environmental

Facility Address: 111 Military

City: Detroit , MI Zip Code: 48209

Mailing Address: Same as above

City: , MI Zip Code:

The Detroit Water and Sewerage Department (DWSD) hereby authorizes the Industrial User specified above to discharge industrial wastewater to the City of Detroit sewer system. This authorization is granted in accordance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state laws or regulations.

The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

In addition, this permit is granted in accordance with the application filed with DWSD, and in conformity with plans, specifications, and other substantive data submitted to the Department in support of the above application.

To continue discharging industrial wastewater after the expiration date, it is the responsibility of the Industrial User to submit an application for permit reissuance at least 90 days before the expiration of the existing permit. The permit reapplication form may be requested from this Department.

Issue Date: April 26, 1999

Expiration Date: September 1, 2004

Issued by:

Stephen J. Kuplicki
Manager

Authorized by:

Kathleen Leavey
Deputy Director

DENNIS W. ARCHER, MAYOR

SECTION B: AUTHORIZED WASTESTREAMS

1. As a result of the permit applications and supporting information filed with the Department, the permittee is authorized to release treated wastewater to the Detroit POTW of the following general types:

   1. Oil/coolant wastes
   2. Waste oil/water/sludge mixtures
   3. Used petroleum oils
   4. Oil-bearing wastewater (non-categorical)
   5. Wastewater from on-site oil tank storage areas (moats)
   6. Stormwater from process and tank storage areas (See attachment 1)
   7. Leachate from various landfills

   The permittee is specifically prohibited from discharging waste materials not specifically enumerated above, including but not limited to, off-site stormwater, wastewaters subject to National Categorical Pretreatment Standards (as enumerated in City of Detroit Ordinance 34-96, Appendix A), wastewaters containing toxic pollutants, and any wastes containing PCBs (Polychlorinated Biphenyls).

2. Upon request of the Department, Sybill, Inc. shall provide the Department access to waste manifests, or other bills of lading, for all incoming materials within seven (7) days of the request; all analytical information available for each manifest or bill of lading shall be included. Copies shall be provided by the permittee of information selected by the Department.

SECTION C: APPLICABLE LIMITS ON RATE AND TIME OF DISCHARGE & FLOW REGULATION

The permittee is authorized to discharge treated wastewater to the Detroit POTW under the following conditions and restrictions:

Days of Discharge:	Monday - Friday
Hours of Discharge:	7:00 A.M. - 5:00 P.M. (E.S.T.)
Daily Rate Limits:	The maximum discharge to the Detroit POTW shall not exceed 150,000 gpd of treated leachate or 270,000 gpd of treated oily wastewater

The permittee is prohibited from discharging any treated leachate or treated process wastewater outside of the stated hours or days of operation, including but not limited to discharges on Saturdays, Sundays, and Holidays.

Discharge authorization may be granted for releases during Holiday periods where the permittee provides at least 72 hours notification to the Department and receives prior written authorization from the DWSD for the proposed Holiday discharge.

SECTION D: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Non Categorical Industrial User
Centralized Waste Treatment Facility

Representative Sampling Location: SL#1: Sampling tank, 3' E. of E. wall of process building, 3' N. of N. containment wall

Batch Discharge Information: Frequency: One (1) batch per day average for treated leachate or treated oily wastewater
Duration: Eight (8) to ten (10) hours per batch
Maximum volume: 150,000 gpd of treated leachate or 270,000 gpd of treated oily wastewater

Applicable Discharge Limitations

PARAMETER		Daily Max. (mg/l)	Min. Sampling Frequency
Total Arsenic	As	1.0	6 / month
Total Iron	Fe	1000.0	6 / month
Total Cadmium	Cd	2.0	2 / week
Total Chromium	Cr	25.0	2 / week
Total Copper	Cu	4.5	2 / week
Total Cyanide	CN	2.0	2 / week
Total Lead	Pb	1.0	2 / week
Total Mercury	Hg	0.005	2 / week
Total Nickel	Ni	5.0	2 / week
Total Silver	Ag	2.0	2 / week
Total Zinc	Zn	15.0	2 / week
Total PCB ❶		0.001	2 / week
PCB-Arochlor 1242			2 / week
PCB-Arochlor 1254			2 / week
PCB-Arochlor 1260		0.0005	2 / week
Fats, Oil, or Grease	FOG	2000.0	Daily
Total Suspended Solids	TSS	10000.0	6 / month
Biochemical Oxygen Demand	BOD	10000.0	6 / month
Phosphorus	P	500.0	6 / month
Acidity/Alkalinity	pH	5.0 - 11.5 units	Daily

The discharge shall comply with the General Pollutant Prohibitions enumerated in Ordinance 34-96, section 56-3- 59.1(a), as amended.

❶ Total PCB is defined as the summation of PCB Arochlors 1242, 1254 and 1260.

SECTION D: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Non Categorical Industrial User
Centralized Waste Treatment Facility

Representative Sampling Location: SL#1: Sampling tank; 3' E. of E. wall of process building, 3' N. of N. containment wall

Applicable Discharge Limitations

PARAMETER	Daily Max. (mg/l)	Min. Sampling Frequency
Total Phenolic Compounds ❷	0.5	
2,4,6-Trichlorophenol		1 / 3 month
2,4-Dichlorophenol		1 / 3 month
2-Chlorophenol		1 / 3 month
4-Chloro-3-Methyl Phenol		1 / 3 month
Pentachlorophenol		1 / 3 month
Volatile Organic Compounds ❷		
1,1,1-Trichloroethane		Monthly
1,1-Dichloroethane		Monthly
1.1-Dichloroethylene or 1,1-Dichloroethene		Monthly
1,2-Dichloroethane		Monthly
2-Chloroethyl Vinyl Ether		Monthly
Chloroethane		Monthly
Chloroform or Trichloromethane		Monthly
Dichlorobromomethane		Monthly
Methylene Chloride or Dichloromethane		Monthly
Tetrachloroethylene or Tetrachloroethene		Monthly
Trichloroethylene or Trichloroethene		Monthly
Vinyl Chloride or Chloroethylene		Monthly
Benzene		Weekly
Ethylbenzene		Weekly
Toluene		Weekly
Xylene		Weekly
Closed cup flash point ❸		Weekly

❷ All parameters shall be analyzed in accordance with methods defined by 40 CFR Part 136, and shall be analyzed using a reasonable Method Detection Limit (MDL) range of 0.1 - 10 ug/l.

SECTION D: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Non Categorical Industrial User
Centralized Waste Treatment Facility

Representative Sampling Location: SL#2: Sample valve from buffer tank in the incineration area; 9' W. of E. wall, 24' S. of N. wall

Batch Discharge Information: Frequency: One (1) batch per day average for treated oily wastewater

Duration: Eight (8) to ten (10) hours per batch

Maximum volume: 270,000 gpd of treated oily wastewater

Applicable Discharge Limitations

PARAMETER		Daily Max. (mg/l)	Min. Sampling Frequency
Fats, Oil, or Grease	FOG	2000.0	Daily

SECTION E: DISCHARGE NOTIFICATION REQUIREMENTS

1) The permittee shall provide notification to the Department prior to the proposed release of treated wastewater which includes the following information:

   a. At least ½ hour prior to release of the proposed discharge, telephone the Department at (313) 297-5844 of the intended release, and

   b. At least ½ hour prior to release of the proposed discharge, facsimile or deliver a copy of analytical result(s) [see E.2 below] conducted on the proposed batch in accordance with methods approved in 40 CFR Part 136, and

   c. Specify the volume of discharge, and the treatment(s) provided to the material in preparation for release.

2) Discharges of treated process wastewater shall only be permitted from tanks 5 & 3. No other source for the discharge of treated or untreated process wastewater is authorized by this permit. Individual samples shall be collected from tanks 5 & 3 respectively and analyzed for Fats, Oil & Grease.

SECTION F: SELF-MONITORING CONDITIONS AND REQUIREMENTS

1) The sampling location(s) used for purposes of compliance sampling and reporting is identified in section D. No alternate locations will be accepted unless approved by the Department. Except in emergencies, all requests for an alternate sampling location or change in the sampling location shall be submitted in writing at least thirty (30) days prior to the proposed date of change.

2) The minimum sampling frequency per pollutant for purposes of compliance sampling and reporting is identified in Section D. The Department recommends and supports sampling efforts greater than the stated minimums.

   The sampling frequency has been determined by the Department for your facility based upon

   (a) Evaluation of compliance history (effluent and non-effluent)
   (b) Volume of process wastewater discharged to the sewer
   (c) Reported discharge frequency (if other than daily)

3) The specific pollutant parameters which are to be monitored for purposes of compliance sampling and reporting are identified in Section D.

(a) A single daily flow-proportional composite sample shall be collected and analyzed for all parameters specified in Section D, except for Fats, Oils and Grease (FOG), Total Cyanide, pH, and the volatile organic compounds, which shall be collected by a minimum of two grab samples from each tank being discharged. A minimum interval of 20 minutes shall occur between subsequent grab samples. The sample shall be collected with sufficient care, so that it is representative of the facility's discharge.

(b) All daily samples shall be individually analyzed, reported and compared against the applicable daily maximum limitations listed in Section D. Where multiple grab samples have been collected, the samples shall be individually analyzed and a sample average shall be calculated from the individual results, and compared against the applicable average limitations listed in Section D.

All sampling and analyses reports for purposes of compliance sampling and reporting, as identified in Section D, must be performed in accordance with the methods and techniques specified in 40 CFR Part 136, as amended.

The usage of approved analytical procedures, as defined in 40 CFR Part 136, is essential to the detection of the parameters being analyzed. Sample analyzed by other methods, e.g. SW-846, are specifically prohibited.

SECTION G: REPORTING AND NOTIFICATION REQUIREMENTS

1) If sampling performed by the permittee indicates a violation of the stated permit limitations, then the permittee shall make a demonstration of compliance which is acceptable to the Department. This demonstration shall consist of the following minimum requirements:

(a) Notification to the Department's Emergency Response Section at the telephone number (313) 297-5828 or fax number (313) 297-5860 within twenty-four (24) hours of becoming aware of the violation.

NOTE: For purposes of this section, when interpreting, "within twenty-four hours of becoming aware" the Department shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance or violation through due diligence.

(b) Report the suspected or known causes of violation and any corrective measures taken or planned to prevent future noncompliance.

(c) Demonstrate a return to compliance by collecting and analyzing at least two or more individual daily samples.

(d) Submit report to the Department within thirty (30) days of becoming aware of the noncompliance.

Due to the POTW's limited capability to treat certain phenolic compounds, where the individual or summation of result for samples obtained for each specific phenolic compound does not exceed 0.5 mg/l, the permittee shall be deemed to have demonstrated satisfactory compliance with the local limitation. The Department shall acknowledge the permittee's satisfaction with this requirement in writing.

SECTION H: OTHER REQUIREMENTS

1) The permittee is required to comply with all conditions, standards, and requirements of this permit. Noncompliance is enforceable in accordance with applicable law.

2) Slug Control/Spill Prevention Plan

The permittee is required initially to submit a Slug Control/Spill Prevention Plan (SC/SPP), in accordance with the City of Detroit Ordinance 34-96, to provide protection against accidental discharges to the POTW, unless the permittee has a written notification form the Deparment exempting them from this requirement.

In addition, the permitte shall review (and if necessary, modify or update its SC/SPP and notify the Department;

(1) every two (2) years and or
(2) any substantial change in operation

3) Non-process Areas - Implementation of Controls and Control Plans

By June 30, 1999, the permittee shall immediately bulkhead all stormwater collection drains, and shall provide adequate controls to prevent the release of fugitive surface water and driveways from non-process areas, including but not limited to parking lot areas, and implement adequate collection and controls to ensure compliance with the limitations and requirements of the Ordinance 34-96.

For purposes of this permit, fugitive surface waters shall include all stormwater, washdown water, sludges and materials deposited, or which can be caused to be deposited, on the parking lot and driveway surfaces.

4) Reporting Requirements

The permittee shall submit a quarterly report in satisfaction of the periodic reporting requirements specified in 40 CFR 403.12, and in accordance with the Ordinance 34-96 Section 56-3-61.1 (e)(8)(b).

The quarterly reports shall be submitted in accordance with the following schedule:

Reporting Period	Report Submittal Date
January 1 - March 31	April 15th
April 1 - June 30	July 15
July 1 - September 30	October 15
October 1 - December 31	January 15

These reports shall contain the following minimum information:

a) The results of all self-monitoring samples collected at the minimum frequencies specified in Section D;

b) The results of all pre-qualifying test results made in accordance with this permit upon which notification to the Department is given.

c) A certified statement from the Authorized Representative stating whether all permit standards, conditions, and requirements are being met.

d) A summary of water usage and discharge information, including both total quarterly volume and daily volume.

e) Written notice of any discharge or substance which, if otherwise disposed of, would be hazardous waste as set forth in 40 CFR Part 261. Such notice must comply with the requirements of 40 CFR § 403.12(p).

f) Written notice of any discharge or substance which, if otherwise disposed of, would be regulated under one or more National Pretreatment Standards as set forth in Appendix A of Ordinance 34-96.

g) An indication of any corrective actions or changes contemplated for the facility or treatment system which may impact or otherwise effect the wastewater discharged from the facility, and any schedules necessary to implement these changes;

h) A summary of all waste manifests or bills of lading for waste materials received for treatment. The summary shall include the reference or other identifying number, the nature and volume of material received and whether treatment and discharge to the Detroit POTW occurred. A log shall be maintained in accordance with attachment 2, and submitted with the report.

i) Any other information which would be reported to satisfy the periodic reporting requirements of 40 CFR 403.12.

j) All analytical reports required by this permit shall be originals or true copies.

Should the permittee submit a true copy in lieu of an original report(s), they shall provide an additional certification statement that the report copies are true.

All reports must be submitted in the form prescribed by the Department or on an alternative form approved by the Department.

The report shall be signed, and dated, by the authorized representative of the Industrial User.

SECTION I: SPECIAL REQUIREMENTS & DEFINITIONS

The following additional requirements and/or definitions shall apply to this facility:

1) For purposes of this permit, a Batch Discharge shall mean a non-continuous release of treated wastewater, resulting from a collection of one or more compatible wastestreams whose volume, duration, or frequency of generation warrant periodic releases as the most efficient means of discharge

The permittee shall maintain a discharge log for all wastewater discharged from the site, including the following entries:

a) Dates of Discharge
b) Volume of wastewater discharged
c) Copies of all analytical results and/or manifests

If the frequency of your batch discharge changes, the permitee shall immediately notify the Department in writing.

2) The permittee shall maintain a log summarizing any analysis conducted on-site. The log shall contain the following minimum information:

a) Date and time of analysis
b) Method of analysis
c) Result of analysis
d) Signature or initial of analyst

3) On or before March 31 of each year, the permittee shall submit an updated report as specified in subsection 1 through 6 of Section 56-3-59.1(f), of Ordinance 34-96.

PERMIT DEFINITION

1. **FACILITY DESCRIPTION**
   The facility is engaged in treatment of non-hazardous wastewater, operates 7 days per week, 2 shifts per day with approximately 20 employees.

2. **PROCESS DESCRIPTION**
   All wastestream previously characterized and accepted at the facility arrives via tankers, sludge boxes or drums. Inbound material is routed to either tanks 19, 14 (leachate) or to tanks 15, 16, 17, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30 (oily wastewater). Inbound material placed in the treatment tanks is treated utilizing methods which involve heat or chemical treatment. The treated oily wastewater is further treated with polymers in tank #9. After chemical treatment the oily wastewater is stored in tank #3 and leachate is stored in tank #5. The treated oily waste from tank #3 is discharged to a buffer tank. The treated oily wastewater from buffer tank is sampled at Sampling Location #2 (SL #2) for FOG analysis and visual inspection. After visual inspection and FOG analysis the treated oily wastewater is discharged to the sewer through Sampling Location #1 (SL #1). The treated leachate from tank #5 is passed through a filtration system (comprising of carbon and sand filters), transferred to a buffer tank and discharged to the sewer through SL#1.

3. **APPLICABLE CLASSIFICATION**
   The facility is classified as a Significant Industrial User (SIU) and Centralized Waste Treatment (CWT) facility discharging greater than 25,000 gpd of process wastewater.

4. **WASTEWATER DISCHARGE FLOW INFORMATION**

Process (leachate):	150,000 gpd avg.
Sanitary:	400 gpd avg.
Boiler feed/blowdown:	10,000 gpd avg.
Air Pollution Control:	2,000 gpd avg.
Total Plant Discharge:	162,400 gpd avg.

or

Process (oily wastewater):	270,000 gpd avg.
Sanitary:	400 gpd avg.
Boiler feed/blowdown:	10,000 gpd avg.
Total plant discharge:	82,400 gpd avg.

5. **BATCH DISCHARGE INFORMATION**

Batch Discharge:	150,000 gallons per batch avg. for treated leachate or 270,000 gallons per batch avg. for treated oily wastewater
Frequency:	One (1) batch per day avg.
Duration:	Eight (8) to ten (10) hours per batch
Maximum Volume:	150,000 gpd or 270,000 gpd

6. **SOURCE OF INFORMATION**

(a) Facility's permit reapplication dated May 28, 1997, (b) inspection conducted by the Department on April 13, 1998, (c) Hydraulic Evaluation Report by company on April 24, 1998, (d) Leachate Analysis Report by company on April 2, 1998, (e) process flow sheet by company on March 5, 1998, (f) meeting between company and Department on August 6, 1998, (g) inspection by the Department on August 17, 1998 and (h) additional information about treatability and compatibility certification by a Professional Engineer submitted by the facility on August 20, 1998 as required by the City of Detroit Ordinance 34-96 Section 56-3-59.1.

Prepared by: Yogendra Kumar Reviewed by: Chris Comment

Date: April 1, 1999 Date: 04/01/99

GENERAL TERMS AND CONDITIONS

The Industrial User is authorized to discharge industrial wastewater to the City of Detroit sewer system in compliance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

1) **Records for monitoring activities** shall be maintained in accordance with ordinance requirements and shall include the following information for all samples:

   a) The date, time, exact place and method of sampling
   b) The names of persons taking the sample
   c) The technique or method of analysis, the date and results of analysis
   d) The names of person performing the analysis

2) **Notification and Reporting Requirements**

CONTROL CENTERS

Systems Control Center	(313) 224-4775	(24-hours)
Wastewater Treatment Plant	(313) 297-9000	
Industrial Waste Control Office	(313) 297-5826	
Industrial Waste Control Fax No.	(313) 297-5860	

Notification:

A. **Sampling Violations - Self Monitoring:**
Within 24 hours of becoming aware of a violation, the IU shall notify DWSD by telephone at (313) 297-5826 or by fax at (313) 297-5860.

B. **Slug Loading / Accidental Discharge:**
Within one (1) hour of becoming aware of an accidental discharge entering into the sewer system, the Industrial User (IU) shall telephone Detroit Water and Sewerage Department (DWSD) at the Systems Control Center and inform the Department about the details of the discharge.

C. **Upset at the IU's Pretreatment Facility:**
Within twenty four (24) hours of becoming aware of an upset, the IU shall telephone DWSD at the System Control Center and inform the Department about the details of the upset and discharge.

D. **Unanticipated Bypass of IU's Pretreatment Facility:**
Within twenty four (24) hours of becoming aware of the bypass, IU shall telephone DWSD at the System Control Center and inform the Department about the details of the discharge.

Submission of Report:

For the incidents B, C, and D, a written report shall be submitted to the Department within five (5) calendar days of becoming aware of the incident. This report shall contain the following information:

i) A description of the discharge and the cause of the incident;
ii) The duration of the incident including exact dates and times or, if not corrected, the anticipated time the incident is expected to continue;
iii) Steps being taken and/or planned to reduce, eliminate and prevent future occurrences of a similar incident.

Anticipated Bypass:

If an IU anticipates the need for a bypass, prior notice shall be submitted to the Department at least ten (10) days, if possible, before the date of bypass. The report shall be accompanied by analytical data, if available, which shows the characteristics of the material to be bypassed. Upon evaluation, the Department will provide the IU with its determination on the bypass.

The IU may also have certain notification requirements under applicable federal regulations, including but not limited to 40 CFR Part 403.

3) **LIMITATIONS ON PERMIT TRANSFER**

The wastewater discharge permit shall not be reassigned or transferred without the written approval of the City of Detroit Water and Sewerage Department and provision of a copy to the new owner or operator. The permittee shall notify the Department of any such changes at least thirty (30) days prior to the change.

4) **MODIFICATIONS OR REVISIONS OF THE PERMIT**

The permittee should notify the Department of any facility or operational changes which may affect the permit.

The terms and conditions of the permit may be subject to modification by the City of Detroit Water and Sewerage Department during the terms of the permit, in accordance with applicable law, including but not limited to the City's ordinance.

5. **CONFIDENTIAL INFORMATION**

Except for data accepted by the City as confidential under the City ordinance, all information and data on the permittee obtained from written reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other government agencies without restriction.

6. LEGAL ACTIONS

a) Any user who violates any local provision, including the failure to pay any fees, charges, or surcharges imposed hereby, or any condition or limitation of a permit issued pursuant thereto or who knowingly makes any false statements, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to this ordinance or wastewater discharge permit or who tampers with, or knowingly renders inaccurate any monitoring device required under this ordinance is guilty of a misdemeanor and shall, upon conviction, be punished by a fine not to exceed $500 for each violation per day or by imprisonment for not more than 90 days or by both.

The Department is hereby authorized to seek, through its counsel, prosecution of criminal charges against any person violating any provision of this ordinance.

b) If any person discharges sewage, industrial wastes, or other wastes into the POTW contrary to the provisions of the ordinance, permit or order issued thereunder, the Director or Board may commence a civil action to enjoin such discharge or to enforce compliance with this ordinance, permit or order issued thereunder, in the Circuit Court for the County of Wayne or other appropriate court. Upon a proper showing of a violation of this ordinance, permit or order issued thereunder, a permanent or temporary injunction may be granted without bond. The Department or Board may also seek additional legal and/or equitable relief.

Instituting suit in the Circuit Court does not constitute as exclusive election of remedies and does not prohibit the Department, Director, Board, or City of Detroit from commencing action in Federal Court for discharges believed to be in violation of this ordinance, State and Federal requirements pursuant to the Clean Water Act, the City's NPDES permit, or other applicable laws or requirements.

The City of Detroit may also recover reasonable attorney fees, court costs, court reporters fees, and other unusual expenses related to enforcement activities or litigation against the person found to have violated this ordinance or the orders, rules, regulations, and permits issued hereunder.

c) All fines, costs and penalties which are imposed by any court of competent jurisdiction shall be payable to the clerk of such court, who shall deposit the same with the City Treasurer, all of which fines, costs, and penalties shall be credited to the appropriate fund of the Water and Sewerage Department.

7) **All reports shall be addressed to:** Detroit Water and Sewerage Department
Industrial Waste Control
303 S. Livernois
Detroit, Michigan 48209

8) **Requirement to Reapply**

This permit shall expire on the expiration date identified. Existing permittees shall apply for permit reissuance a minimum of 90 days prior to the expiration of existing permits on a form prescribed by the Department. Upon timely application for reissuance of a permit, the expired permit shall be automatically extended until modified or reissued by the Department. Failure to submit a timely reapplication for reissuance may result in a delayed issuance of a permit and a cessation of unpermitted discharges to the sewer system.

9) **Records Retention**

The permittee shall maintain records of all information from monitoring activities, permit requirements, or 40 CFR 403.12 for no less than three (3) years.

10) **Operation and Maintenance of Pretreatment Facilities**

The permittee shall operate and maintain any and all pretreatment facilities in a prudent and professional manner. Records of operation and maintenance shall be provided to the Department for review, upon request.

11) **Right of Entry**

The Department's employees or authorized representative shall have ready access to the industrial user's premises to engage in inspection, sampling, compliance monitoring and/or metering activities. Each such activity shall be commenced and completed at reasonable times, and in a reasonable manner. It is the permittees' responsibility to make prompt and necessary arrangements so that upon presentation of appropriate credentials, personnel from the Department will be permitted to enter immediately for the purposes of performing their specific responsibilities.

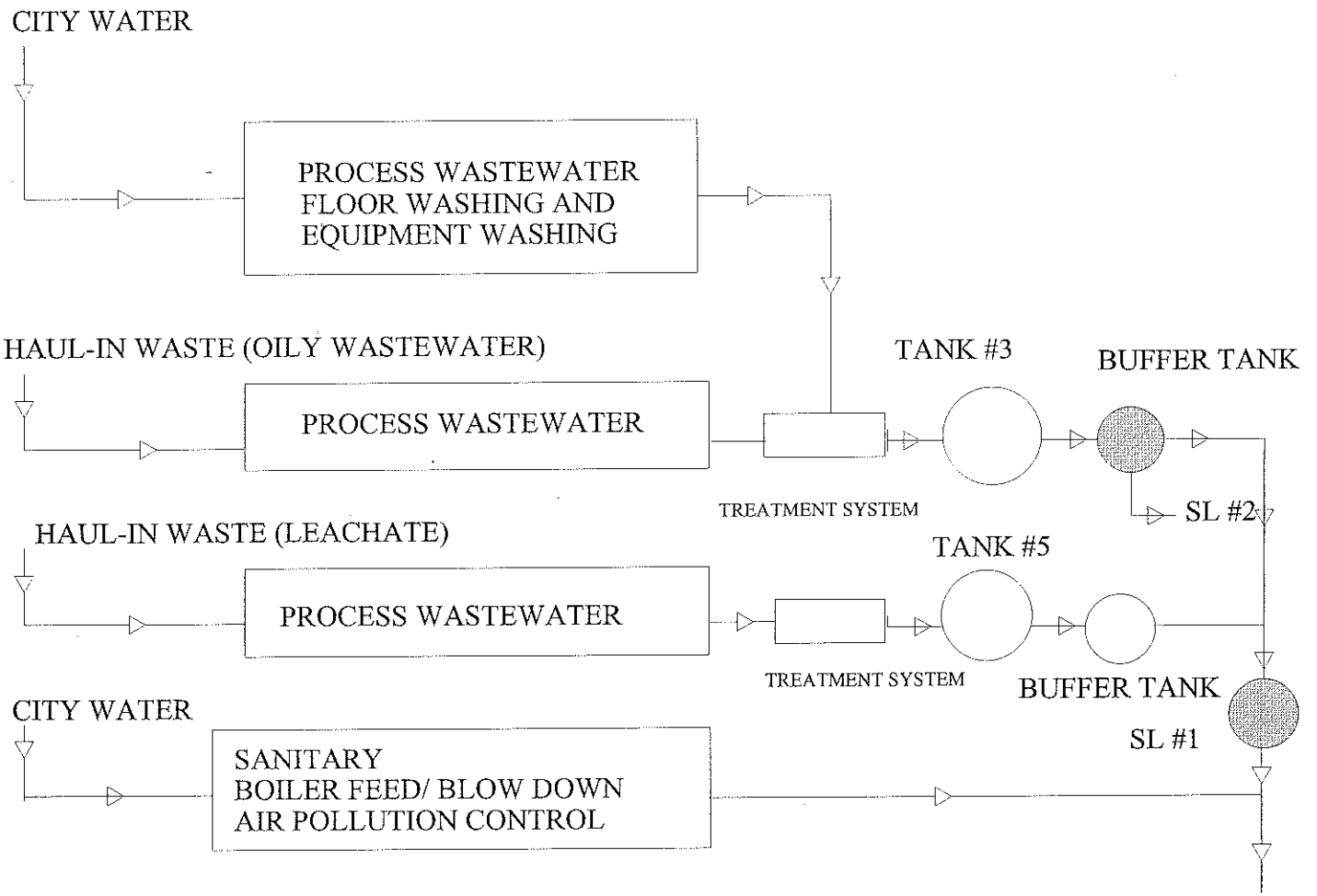
Denial of access to any authorized Department representative shall result in enforcement action.

12) **Permit Revocation**

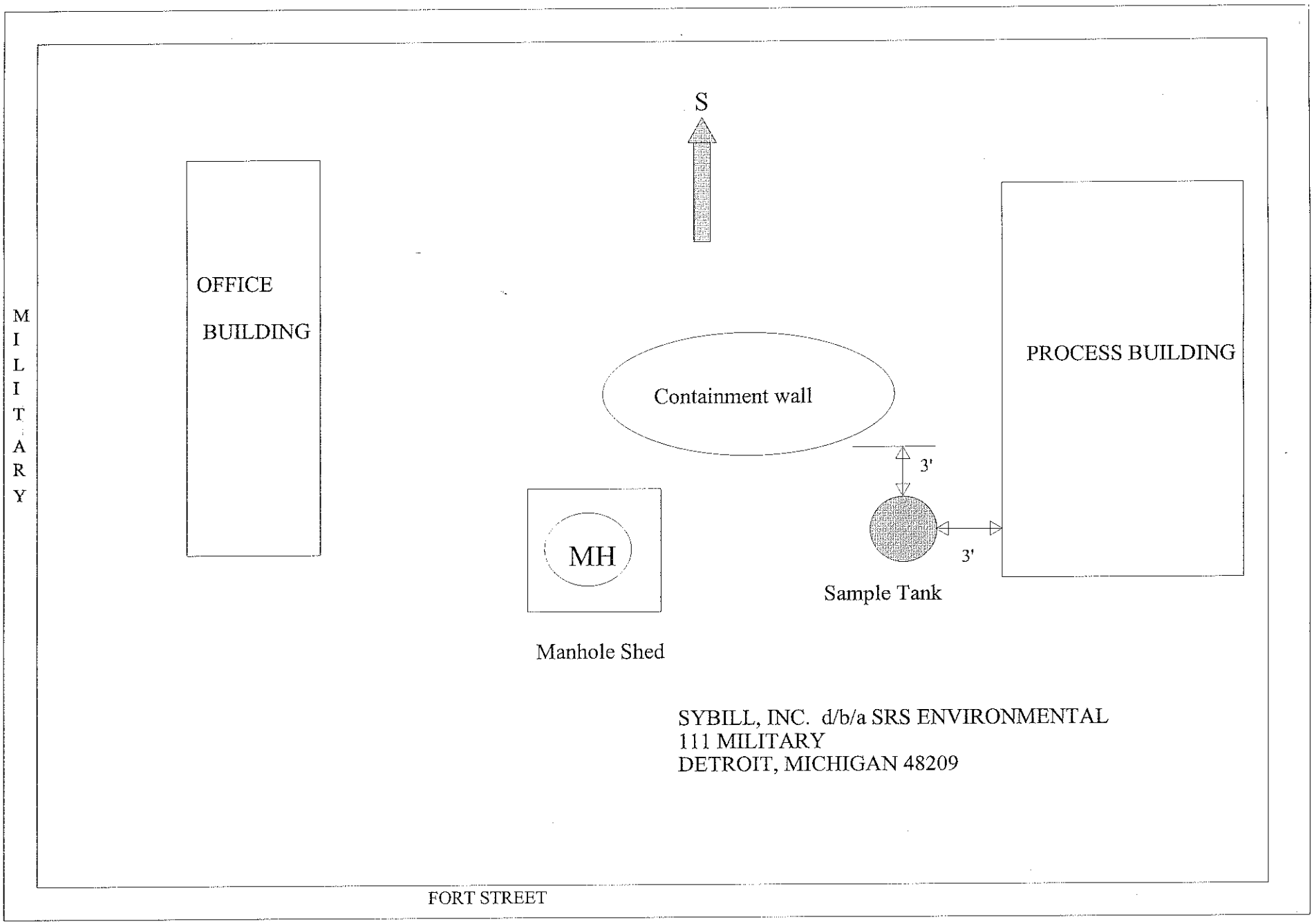
The Department may revoke this permit at any time in accordance with applicable law. Actions for which a permit may be revoked include but are not limited to failure of a facility to comply with the permit, failure to comply with an administrative order, or Court order, discharging wastewater which has the potential to or does threaten the POTW or the community, discharges which would cause the POTW to violate its NPDES permit.

Where such action is taken by the Department, the former permittee shall have an opportunity for a hearing for Permit reinstatement in accordance with applicable law.

SYBILL, Inc. d/b/a SRS ENVIRONMENTAL
111 MILITARY
DETROIT, MI 48209



PROCESS FLOW DIAGRAM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OFFICE
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PROCESS BUILDING
Containment wall
3'
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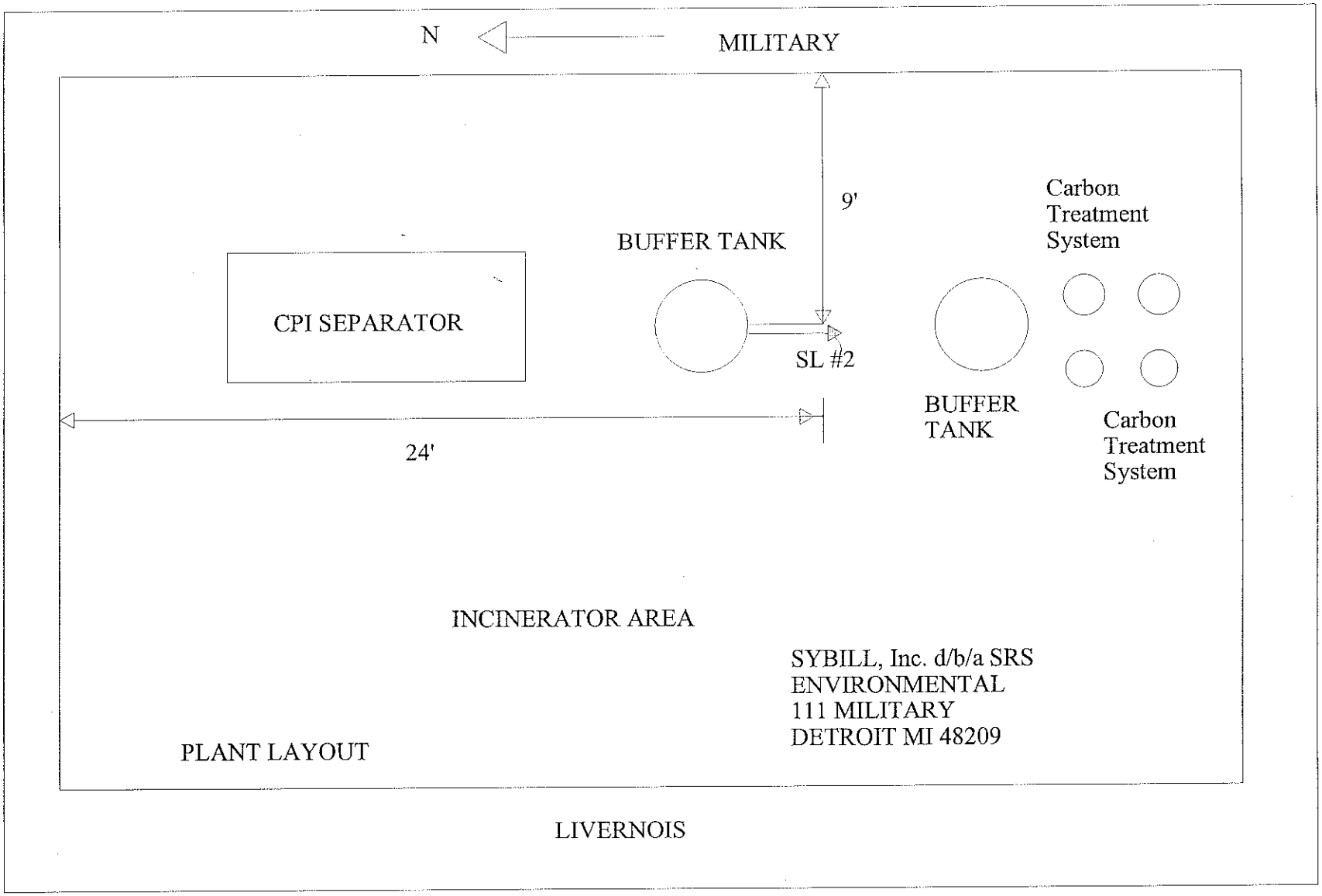
Sample Tank
Manhole Shed
SYBILL, INC. d/b/a SRS ENVIRONMENTAL
111 MILITARY
DETROIT, MICHIGAN 48209
MILITARY
FORT STREET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9'
BUFFER TANK
Carbon
Treatment
System
CPI SEPARATOR
SL #2
BUFFER
TANK
Carbon
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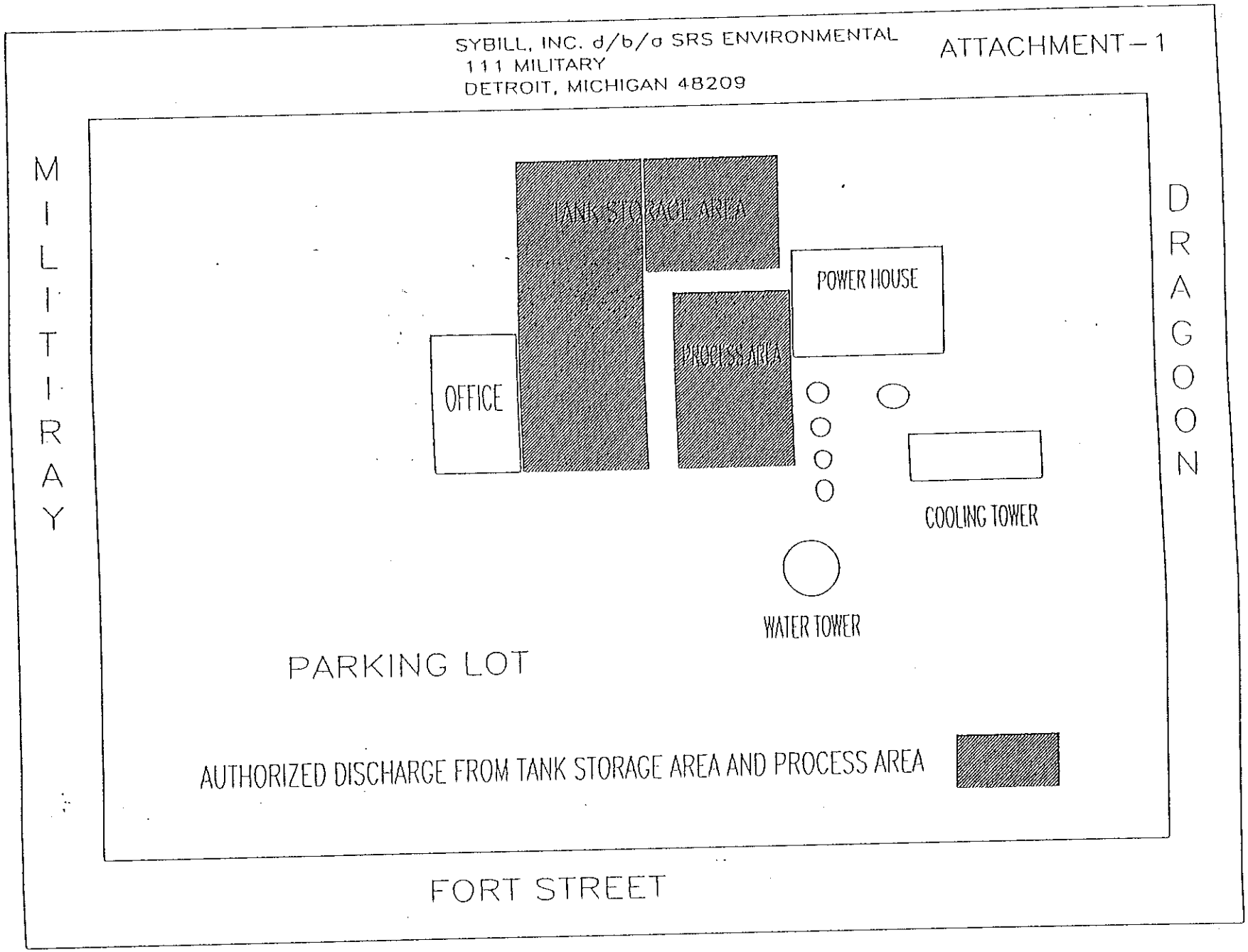
System
24'
INCINERATOR AREA
SYBILL, Inc. d/b/a SRS
ENVIRONMENTAL
111 MILITARY
DETROIT MI 48209
PLANT LAYOUT
LIVERNOIS

SYBILL, INC. d/b/a SRS ENVIRONMENTAL
111 MILITARY
DETROIT, MICHIGAN 48209

ATTACHMENT – 1



Permit 2
Permit to Install Application
Sybill Incorporated
Process Tanks and
Pollution Control Equipment

SYBILL, Incorporated

111 Military
Detroit, Michigan

Prepared by:
ECT, Inc.

PROCESS DESCRIPTION:

The incoming waste materials accepted at Sybill have varying amounts of oil, water and solids. For the purposes of this discussion the fractions of these constituents will be presented as (oil, water, solids). The incoming wastes are by-products of industrial processes which have lost their effectiveness for a variety of reasons, but typically have problems of solids building-up within the oil. The service provided by Sybill is to accept all types of waste oil and remove the solids and water to produce a usable oil.

Because the oils come from a variety of industries the treatment process must be very flexible. Another concern is mixing waste oils from different generators. Often the competing chemistrics added to the oil at the generator makes the resulting oil treatment difficult. Ideally, tankers would be unloaded directly into treatment tanks and treated separately or with oils proven to be compatible.

OIL STORAGE & DELIVERY:

Tanks 1 and 2 are to be used for incoming storage only when the processing cannot keep up with the inbound material. Typically this occurs when major tank clean-outs occur at the generators facility. The goal, however, is to keep these tanks as near to empty as possible.

As the tanks are filled, the fumes are vented directly to the packed Tower Scrubber. The filling and storage of the oil/water liquid with heat will result in the emissions of Volatile Organic Compounds (VOCs) and Hydrogen Sulfide. (See Section 3, Table 1 & 2 for emission concentrations. See Section 3, Diagram 6 for emission controls.) The liquid enters the tanks at ambient temperature and pressure conditions. The tanks are indirectly heated in order to maintain temperature of the 120°F. The indirect heat source is covered under Sybill's Boiler Permit.

OIL PROCESSING:

A majority of the oil processing will occur in tanks 9, 14, 15, 16 and 17. The incoming oil will have a great deal of variability ranging from (2%, 95%, 3%) to (95%, 1%, 4%). The most typical wastewater will be low oils, high water/solids.

The typical treatment (90% of the time) will consist of raising the temperature to 180° F, using indirect heating; introducing a chemical de-emulsifier, either through a liquid sparging system or below surface injection; mixing thoroughly; settling over an extended quisessent period; removal of highest quality oil; removal of water phase; removal of solid as necessary. The oil product resulting from the process is typically (92%, 6%, 2%) this product has value in the fuels market without any additional processing. It can also be further processed (polished) to increase the value of the product as discussed in the subsequent section. At the end of this procedure, some amount of material remain in the tanks as a result of the inability to precisely remove materials at the phase breaks. This excess material is left in the tanks for processing with subsequent batches.

Some oils require a more aggressive treatment to get them to break. Likewise, the "rag-layer" from the conventional treatment requires addition processing. This aggressive treatment (< 10% of the time) occurred in tanks 9 & 14. The aggressive treatment consists of heating the contents to 200° F using indirect heat; slowly introducing sulfuric acid using liquid sparging; mixing thoroughly; allowing an extended quisessent period; removal oil product; removal excess water; and, removal solids as necessary. The oil product from the aggressive treatment process is similar to the product from the typical treatment process (92%, 6%, 2%). This product is only amendable to the fuels program for two reasons: 1) the acidic treatment has oils characteristic number making it inappropriate for many applications, and 2) The remaining 6% of water in the oil is often strongly acidic and is damaging to the centerfuge.

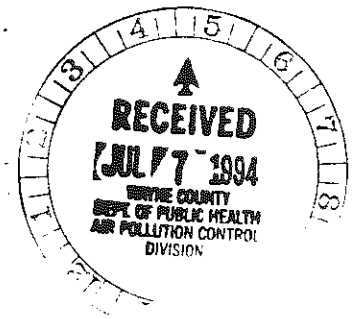
The filling and treatment process of the oil/water liquid with heat and chemical will result is emission of Particulate Matter, Hydrogen Sulfide, and VOCs. (See Section 3, Table 1 & 2 for concentrations before control). All emissions will be vented from Tanks 9, 14, 15, 16 & 17 to inlets of Venturi Scrubbers. (See Section 3, Diagram 8, for emission control equipment used for controlling contaminants). Maximum concentration of Hydrogen Sulfide being emitted out the stack after emission control would be less than 0.002 tons/yr. The expected concentration of VOCs emitted out the stack would be less than 0.308 tons/yr. Particulate Matter is expected to be less than 0.1 lbs/1,000 lbs. air after emissions controls.

OIL POLISHING

The oil polishing equipment was originally installed to substantially increase the throughput of the facility to address the remediation of tanks 3, 4 & 5. This is discussed in further detail in attachment F.

Upon the completion of the remediation effort, the oil polishing process will be used to improve the product from (92%, 6%, 2%) to (99%, 0.5%, 0.5%). The oil will be heated to 180°F in tanks 11 & 12. No addition of chemical is anticipated, however, some water may be added to aid in the centrifucation process. The water/solids will be returned to the wastewater treatment process.

The tanks are indirectly heated to maintain the viscosity of the liquid in order to be transferred easily to tanker trucks. Anticipated emissions from the tanks will be vented directly to the inlet of the Packed Tower Scrubber. (See Section 3, Diagram 9). Concentrations of emission after pollution control equipment are provided in Table 1. The indirect heat source is covered under Sybill's Boiler Permit.

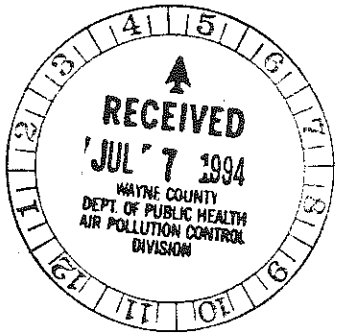


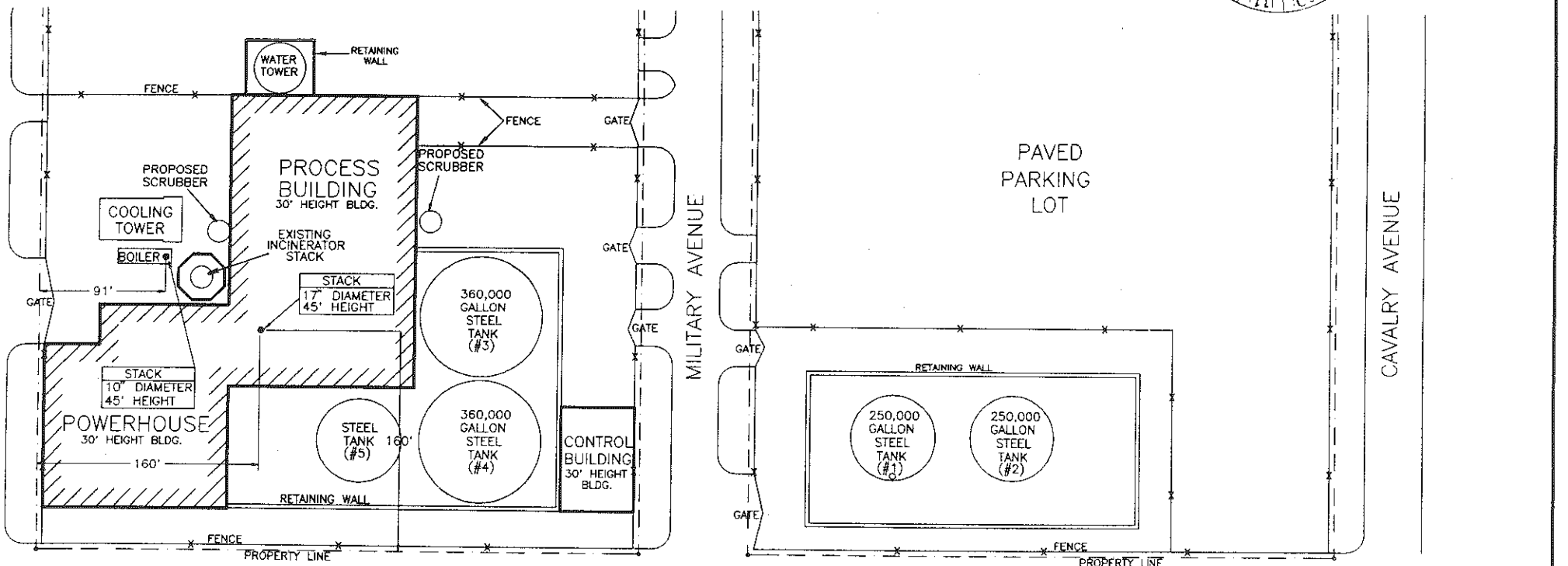
WASTEWATER TREATMENT

All waters and solids from all oil treatment processes will be delivered to the wastewater treatment process for further treatment. Waters will be added to the flash mix tank for pH adjustment and polymer addition prior to flowing to tank 5 for clarification then being discharged to the DWSD sewer. Solids collected in the bottom of the clarifier are pumped to the sludge thickener. The decant from the sludge thickener is returned to the flash tank and the thickened sludge is pumped to the filter press. The filtrate from the filter press is returned to the flash tank, the dewatered sludge is dropped into a roll-off box and transported to a landfill.

OIL PRODUCT STORAGE

Oil, once processed, is stored in tanks 3, 4, and 10 prior to transport to the buyer of the product.





N

LEGEND:

FENCE

PROPERTY LINE

SYBILLST

ISSUE	DATE	DESCRIPTION
1	06/03/94	INITIAL DRAWING

SYBILL
DETROIT, MICHIGAN
93-588

STACK LAYOUT MAP

SCALE: 1" = 60'	DRAWN BY: JCZ
DESIGNED BY: JCZ	DATE: 06/03/94

ECT Environmental Consulting & Technology, Inc.

SHEET NO. 3

SYBILL PROCESS FLOW DIAGRAM

7/JULY/94

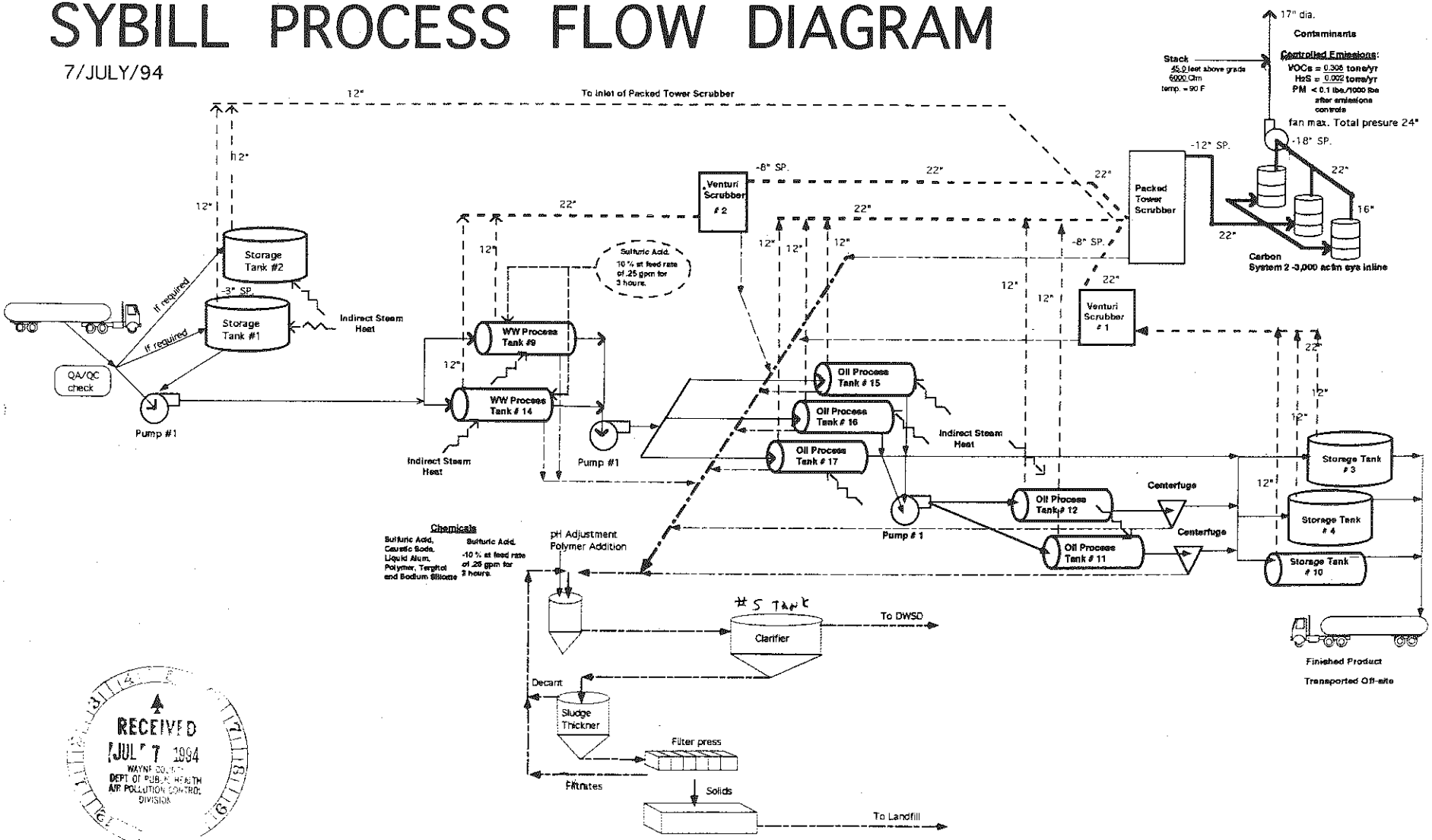
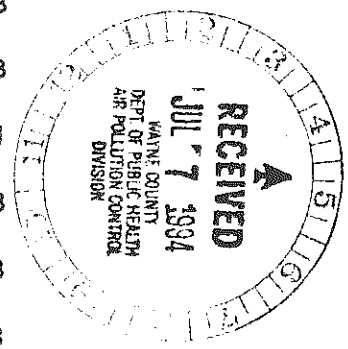


TABLE 1
EMISSION INVENTORY
PROCESS TANKS
SYBILL, INC.

Tank	Flowrate (cfm)	VOC Losses Uncontrolled (lbs./yr.)	VOC Losses Controlled (lbs./yr.)	VOC Concentrations Uncontrolled ppm	H_2S Emissions Uncontrolled (lbs./yr.)	H_2S Emissions Controlled (lbs./yr.)
1	26.783	989.49	9.89	933.83	5.54	0.055
2	26.783	989.49	9.89	933.83	5.54	0.055
3	26.783	2201.48	22.01	2077.6	12.33	0.123
4	26.783	2201.48	22.01	2077.6	12.33	0.123
9	26.783	382.05	3.82	360.56	2.14	0.021
10	26.783	1220.14	12.20	1151.5	6.83	0.068
11	26.783	504.70	5.05	476.31	2.83	0.028
12	26.783	504.70	5.05	476.31	2.83	0.028
14	26.783	367.15	3.67	346.50	2.06	0.021
15	26.783	298.63	2.99	281.83	1.67	0.017
16	26.783	298.63	2.99	281.83	1.67	0.017
17	26.783	298.63	2.99	281.83	1.67	0.017
Total		**10256.57**	**102.57**		**57.44**	**0.57**



Modified. TABLE 2

Above Ground Storage Tank Specifications

Sybill Incorporated

7/7/94

Tank No.	Description of Contents	Gallons Capacity	Size		Air Volume CFM	Heated Yes/No	Temp. (F)	Chemicals (Yes/No)	Process Hrs.	Fill Rate gpm	Location/Comments
			dia. ft.	height ft.							
1	Incoming waste storage	250,000	35	40	26.738	Yes	120	No	NA	200	Storage Area across Military St. to the east
	(90% Water/10% Oil)										Vertical Tank
2	Incoming waste storage	250,000	35	40	26.738	Yes	120	No	NA	200	Storage Area across Military St. to the east
	(90% Water/10% Oil)										Vertical Tank
3	Finished Product Storage	360,000	64	15	26.738	Yes	150	No	NA	200	Main Storage Area near Process Bldg.
	(Spec Oil 95-99% Oil)										Vertical Tank
4	Finished Product Storage	360,000	64	15	26.738	Yes	150	No	NA	200	Main Storage Area near Process Bldg.
	(Spec Oil 95-99% Oil)										Vertical Tank
9	Incoming waste Pretreatment - 90% Water/10% Oil	20,000	12	30	26.738	Yes	150	Yes	5.5	200	Inside Process Building
	(settlement/chemical addition)										Horizontal Tank
10	Finished Product Storage	15,000	10	23	26.738	Yes	210	No	NA	200	Inside Process Building
	(Spec Oil 95-99% Oil)										Vertical Tank
11	Oil Process	30,000	15	35	26.738	Yes	210	~~Yes~~ NO	7	200	Inside Process Building
	(50% Water/50% Oil)										Horizontal Tank
12	Oil Process	30,000	15	35	26.738	Yes	210	~~Yes~~ NO	7	200	Inside Process Building
	(50% Water/50% Oil)										Horizontal Tank
14	Incoming waste Pretreatment - 90% Water/10% Oil	15,000	12	16	26.738	Yes	210	Yes	4.5	200	Inside Process Building
	(settlement/chemical addition)										Horizontal Tank
15	Coned bottom settling tanks	11,000	12	16	26.738	Yes	210	~~Yes~~ NO	4	200	Inside Process Building
	(80% Oil/20% Water)										Vertical Tank
16	Coned bottom settling tanks	11,000	12	16	26.738	Yes	210	~~Yes~~ NO	4	200	Inside Process Building
	(80% Oil/20% Water)										Vertical Tank
17	Coned bottom settling tanks	11,000	12	16	26.738	Yes	210	~~Yes~~ NO	4	200	Inside Process Building
	(80% Oil/20% Water)										Vertical Tank

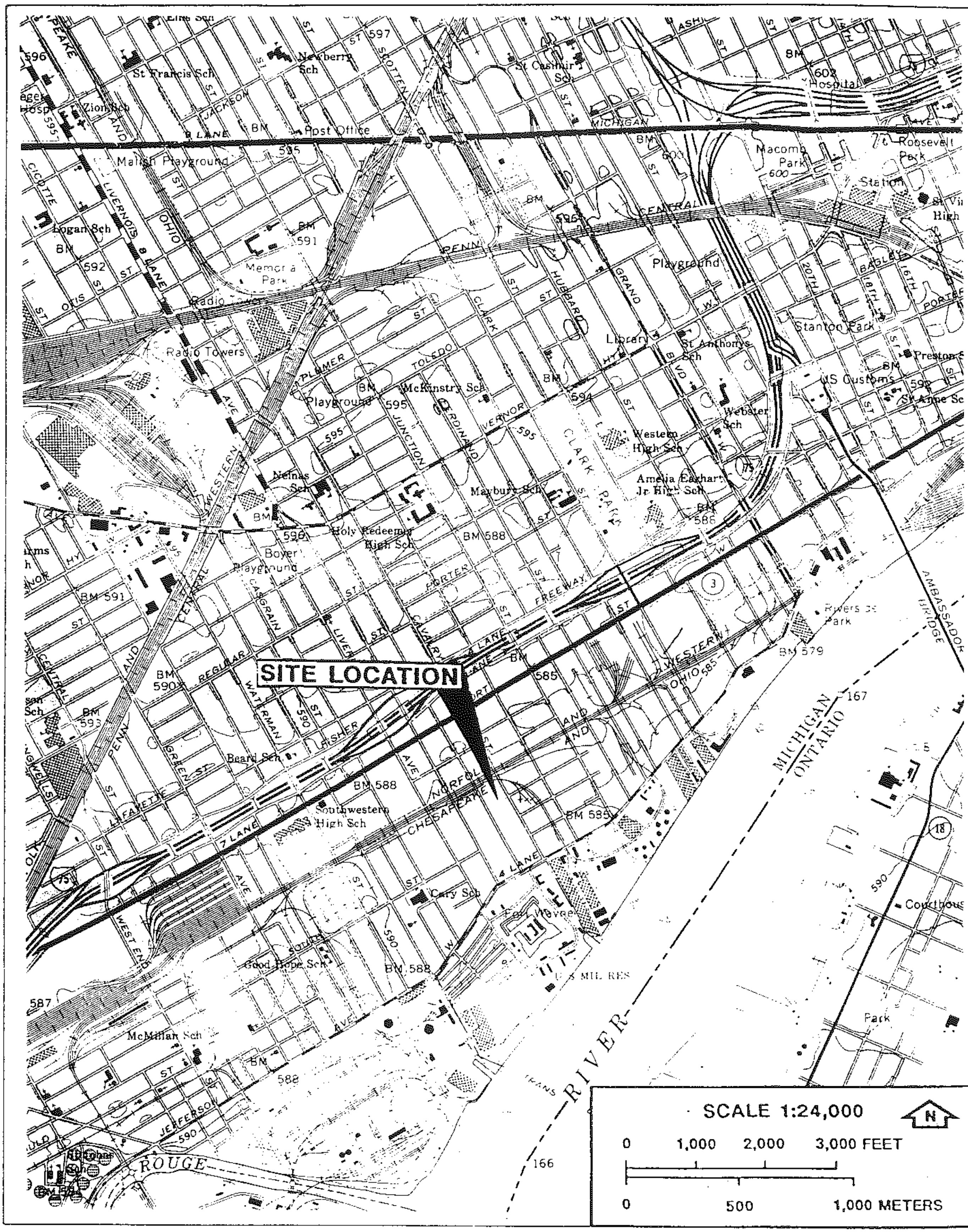


FIGURE 1
SITE LOCATION MAP
SYBILL FACILITY
111 MILITARY
DETROIT, MICHIGAN

Environmental Consulting & Technology, Inc.

111 S. Military

AIR QUALITY DIVISION
OCT 2 4 1996
PERMIT SECTION

MICHIGAN STATE TAX COMMISSION
DEPARTMENT OF TREASURY

AIR QUALITY DIVISION
AUG 0 5 1996
PERMIT SECTION

DATE: July 30, 1996

TO: Department of Natural Resources
Air Quality Division

FROM: State Tax Commission

SUBJECT: Transmittal of application for tax exemption of air pollution control facilities

Pursuant to paragraph (2) Section 2 of Act 250, P.A. 1965, as amended, there is hereby submitted:

Application Number: 2439

Filed by: Sybill, Inc.

Located at: 111 Military

(Township, City): City of Detroit

County of: Wayne

Kindly notify this office if all, part or none of the structural or equipment facilities meet the requirements of the Act.

Sivaswami Amarnath, Manager
Exemption Program Section
State Tax Commission

SA/dja

Enclosure

WAYNE CO.
DEPT. OF
AIR QUALITY
'96 NOV -6 P4:30

Michigan Department of Treasury
L-4358 (Rev. 11-82)

APPLICATION FOR AIR POLLUTION CONTROL TAX EXEMPTION CERTIFICATE

(Sections 336.1 to 336.8, Inclusive, C.L. 1948)

NOTE: This application and attachments regarding items 2 through 7 are to be prepared & filed in Triplicate. Attachments for item 1 may be single copy only.

To be filed with: Michigan State Tax Commission
Department of Treasury
Treasury Building
Lansing, Michigan 48922

Pursuant to the Provisions of Section 336.1, C.L. 1948, SYBILL, INC. (Applicant's Name) hereby makes application for certification for tax exemption as an Air Pollution Control Facility of machinery, equipment and property located at 111 MILITARY (Street Address) DETROIT (City or Township (Please Specify)) WAYNE (County), Michigan, and hereby submits the following documents and information.

1. One copy of the plans specifications and drawings of the equipment for which tax exemption is requested. These drawings must clearly indicate which equipment (collectors, hoods, ductwork, etc.) the applicant is requesting tax exemption for and the position of the equipment relative to the outer shell of the building housing the equipment.

2. A list and a cost breakdown for the individual component parts of the equipment for which the applicant is requesting tax exemption (i.e., provide separate installed costs for the collector, blowers and mowers, hoods and ductwork, stack, monitoring equipment, etc.).

3. A narrative statement which completely explains how each component part fits into the system and how each component and the entire system perform an air pollution control function. The narrative statement must also identify any non-air pollution control functions the equipment may have.

4. A statement regarding status of permit application to construct, install or alter air pollution control equipment, including agency granting approval, application date and number, if the equipment was installed after August 15, 1967. (Questions regarding instructions 1 through 4 should be directed to the Permit Engineers, Air Quality Division, Department of Natural Resources at (517) 322-1333.)

5. Status of construction of facility at date of application 100%

(If not begun as of date of application, date of beginning must be furnished within 10 days from date of beginning of construction.)

6. The cost of the facility to the applicant. (Indicate whether the cost is actual and final, or if an estimation.)

   Total cost of the facility $ 1,087,799.42 [XX] ACTUAL/FINAL [ ] ESTIMATED

   Cost of the portion claimed to be exempt $ 100%

   (If cost is an approximation, actual and final cost must be furnished within 90 days from the date of completion of construction.)

7. The commercial or productive value derived from any materials captured or recovered by air pollution control facility and computed on a yearly basis is $ -0-

Company Name: SYBILL, INC.

By: [signature] Applicant 6-30-96
Signature and Date

Title: CONTROLLER

Telephone No: 313-582-2520

Mailing address if different from facility location: P. O. BOX 5006
DEARBORN, MI 48128

FOR THE USE OF THE OFFICE OF THE STATE TAX COMMSSION

APPLICATION NO. 2439

DATE FILED IN THE OFFICE OF THE STATE TAX COMMISSION 6-27-96

APPROVAL OF THE HEALTH DEPARTMENT _____

DETERMINATION _____ CERTIFICATE NO. _____ DATE _____

SYBILL, Incorporated
Process Flow Description

Sybill's facility provides treatment services for a variety of non-hazardous waste streams. We accept for treatment, processing, disposal and recycling the following non-hazardous waste streams:

- Spent Coolants and Oils
- UST Rinse Waters
- Industrial Waste Liquids
- Landfill Leachates
- Sludges
- Excavation Waters

All waste streams accepted at our facility, henceforth referred as " inbound" material, must comply with regulatory, operational and non-hazardous classification parameters. Attachment A. Waste Stream Specification Sheet, illustrates the compliance requirements. Inbound material must be characterized by the generators and analytical data in proof of conformance to the specification sheet must be provided and on-file at SYBILL prior to acceptance of the inbound material.

Inbound material, previously characterized and accepted arrives at SYBILL via tankers, sludge boxes or drums. All inbound material must be documented per Act 451 in the State of Michigan with a completed DNR Manifest. SYBILL personnel remove a small quantity of the inbound material from the delivery container and our laboratory performs a " Fingerprint" analysis. Essentially, this analysis is used to prove conformance of the inbound material to the waste characterization report on file and to determine the best method of treatment/processing.

Inbound Process Plan

Figure 1, attached, depicts the process flow utilized at the SYBILL facility. Inbound material which has been accepted may be routed to one of three major location groups predicated upon the nature of the material, and the operating state of the plant. Based upon the plant being busy, the inbound material may be diverted and pumped into either of Tank 3 or 4. These tanks are simply holding tanks to supply the plant further when capacity dictates. In the event the inbound material is deemed to be mostly water, the inbound material will be pumped into Tank 10, which begins the water discharge process to the Detroit sewer system. When treatment is deemed, the inbound material will be pumped into Tanks 9, 14, 11,12, 15, 16, 17, 20, 21, 22, 23, 24, or 25.

Treatment Process

Inbound material placed in Tanks 9, 14, 11, 12, 15, 16, 17, or 20-25 is treated utilizing proprietary methods which involve heat and/or chemicals. Any and all heat is provided as steam via heat transfer piping. Chemical treatment may involve Caustic, Aluminum

Sulfate, or Polymers. The results of the treatment process are: 1) Water which is piped to Tank 10 for final treatment and discharge, 2) Reclaimed oil which is piped into the storage tanks (Tanks 1, 2 S4, and 18), and 3) Sludges which can be safely disposed into landfills. Treatment may also involve transfer of the material being treated (In-process fluid) to other tanks as shown in Figure 1.

Water Discharge System

All water which results from the SYBILL treatment process flows into Tank 10 which is used as a buffer tank to the discharge process. Heat is used in this tank to further break any more oil from the water. Sample testing and quality monitoring are performed on the contents of this tank and chemicals may be added to adjust pH levels. The water from Tank 10 is then routed into a large Separator box. Separated oil is pumped back into the process tanks while clean water is pumped into Tank 5. The contents of Tank 5, are tested for FOG levels and pH levels. If the contents of Tank 5 meet the Detroit Water and Sewerage Department (DWSD) discharge guidelines, then this water is pumped into a carbon/sand trap system and then into the City of Detroit sewer system. In the event that the levels are not acceptable, the "water" is cycled back into the process tanks for further processing.

Capacity and Volumes

The SYBILL facility as illustrated in Figure 1 is capable of processing about 150,000 gallons of inbound material every 24 hours. It is estimated that about 120,000 gallons of this waste stream will be water which can be discharged, using the method described above, on a "batch" basis. The treatment process has been expanded with additional tanks (20-25) as illustrated in Figure 1. Based upon the physical building limitations, it is possible to double the process tank capacity and thus to double the possible water discharge volume. In conformance to requests by the DWSD, a discharge flowmeter will be added to the sewer discharge line to more accurately determine the discharge flow. Further, filter press equipment will be added in the near future to improve the sludge process.

Miscellaneous

For informational purposes, please note that two tanks are used for chemical storage. Tank 19 and Tank S3 are respectively used to store Caustic and Alum. Additionally, the attached Figure 2 illustrates the air control system which has been installed to meet EPA air quality guidelines. Figure 3 attached illustrates the physical plant layout with all tanks and systems shown.

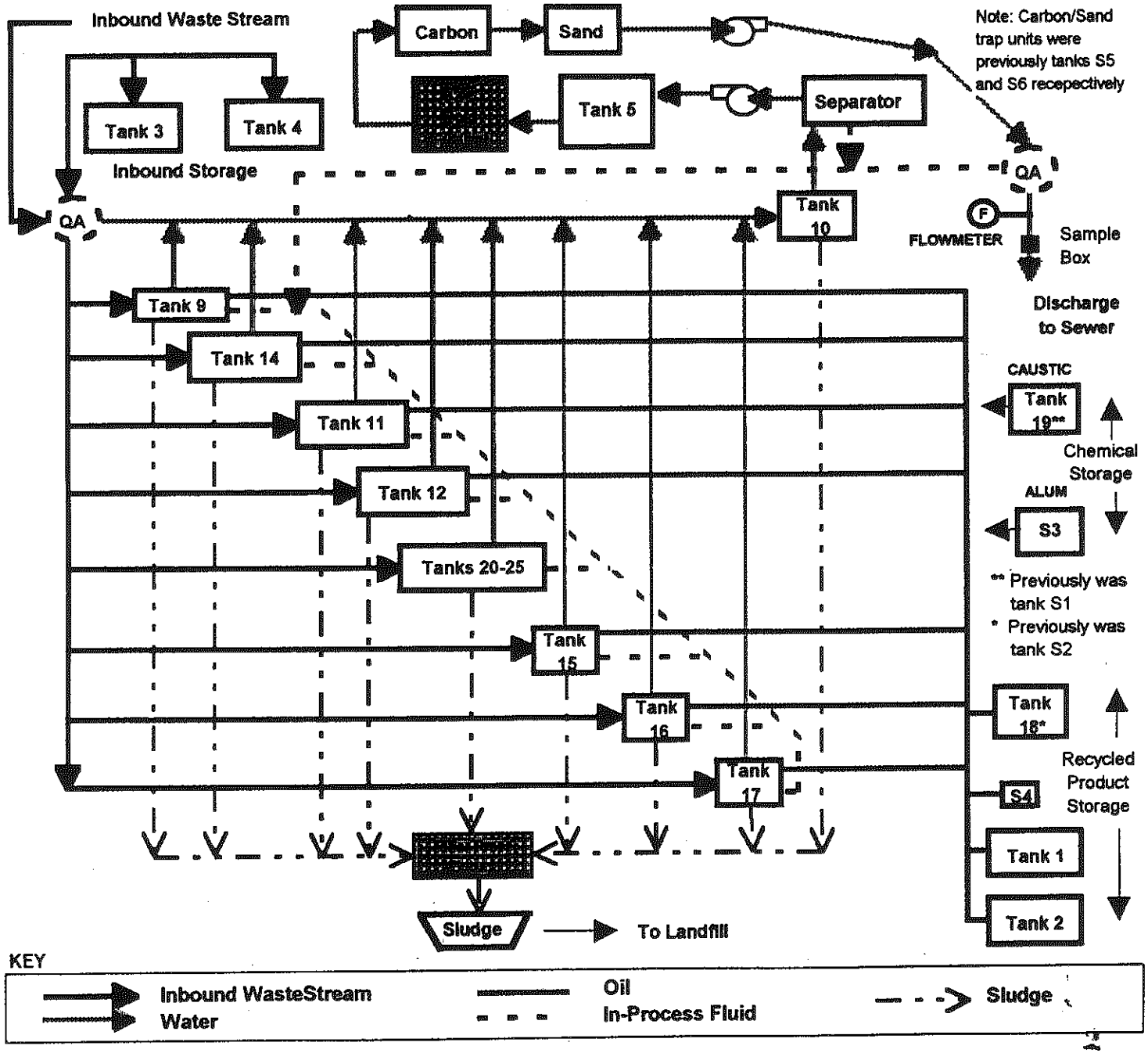

Inbound Waste Stream
Carbon
Sand
Note: Carbon/Sand trap units were previously tanks S5 and S6 recepectively
Tank 3
Tank 4
Tank 5
Separator
Inbound Storage
QA
QA
Tank 10
F
FLOWMETER
Sample Box
Discharge to Sewer
Tank 9
Tank 14
Tank 11
Tank 12
Tanks 20-25
Tank 15
Tank 16
Tank 17
CAUSTIC
Tank 19**
Chemical Storage
ALUM
S3
** Previously was tank S1
* Previously was tank S2
Tank 18*
Recycled Product Storage
S4
Tank 1
Tank 2
Sludge
To Landfill
KEY
Inbound WasteStream
Water
Oil
In-Process Fluid
Sludge

FIGURE 1

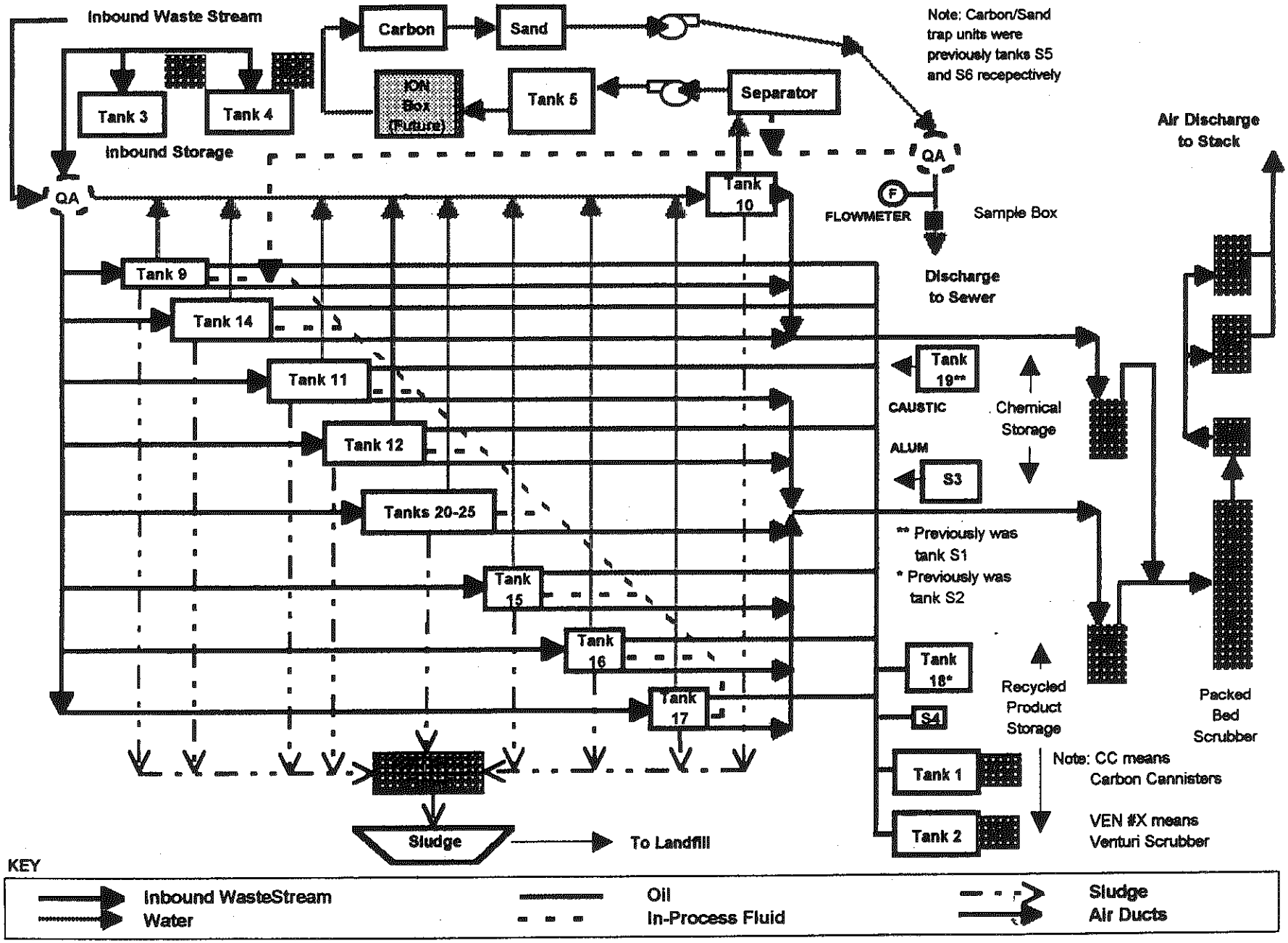
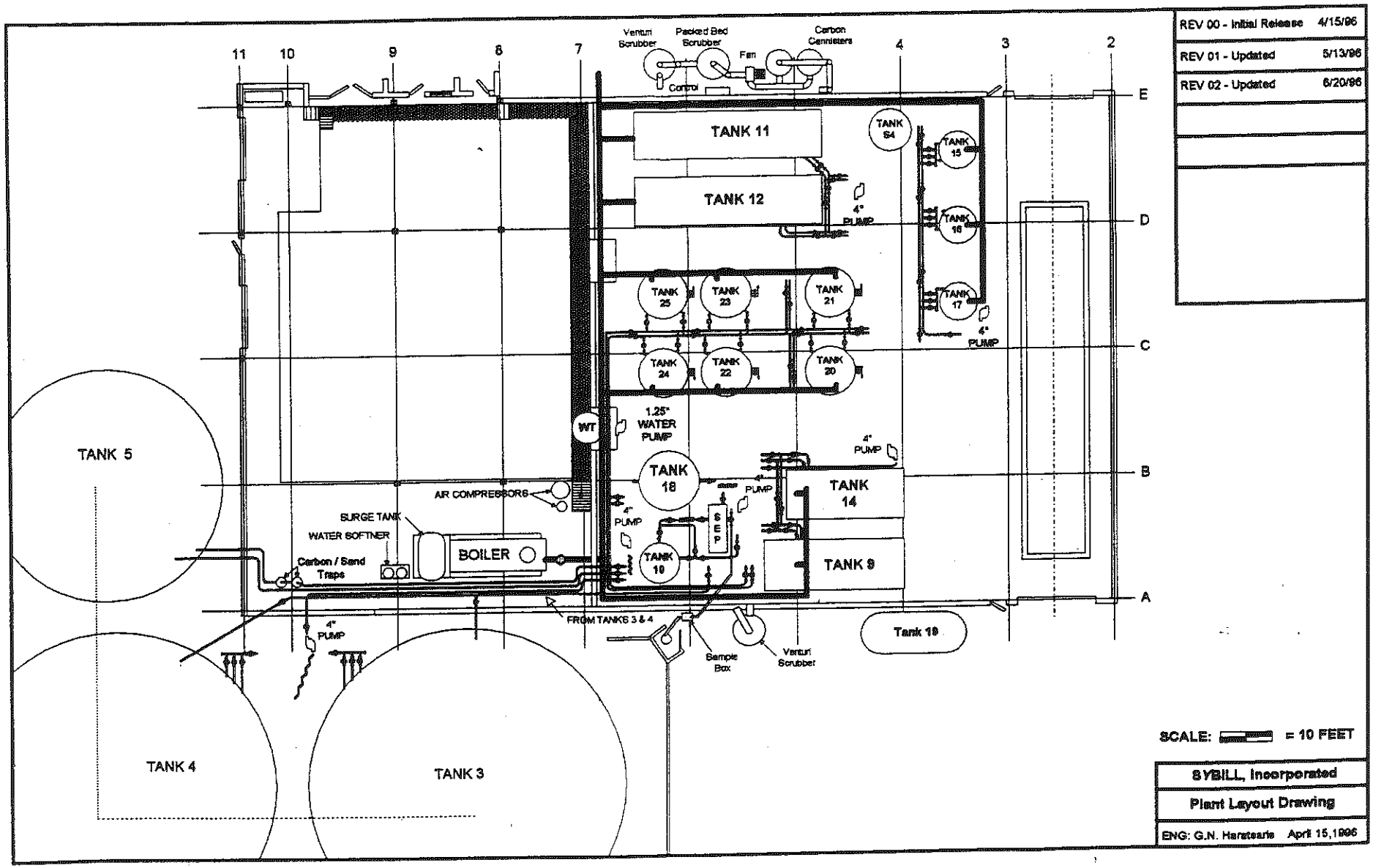

Inbound Waste Stream
Carbon
Sand
Note: Carbon/Sand trap units were previously tanks S5 and S6 recepectively
Tank 3
Tank 4
ION Box (Future)
Tank 5
Separator
Inbound Storage
QA
QA
Tank 10
F
FLOWMETER
Sample Box
Air Discharge to Stack
Discharge to Sewer
Tank 9
Tank 14
Tank 11
Tank 12
Tanks 20-25
Tank 15
Tank 16
Tank 17
Tank 19**
CAUSTIC
Chemical Storage
ALUM
S3
** Previously was tank S1
* Previously was tank S2
Tank 18*
S4
Recycled Product Storage
Packed Bed Scrubber
Tank 1
Tank 2
Note: CC means Carbon Cannisters
VEN #X means Venturi Scrubber
Sludge
To Landfill
KEY
Inbound WasteStream
Water
Oil
In-Process Fluid
Sludge
Air Ducts

FIGURE 2



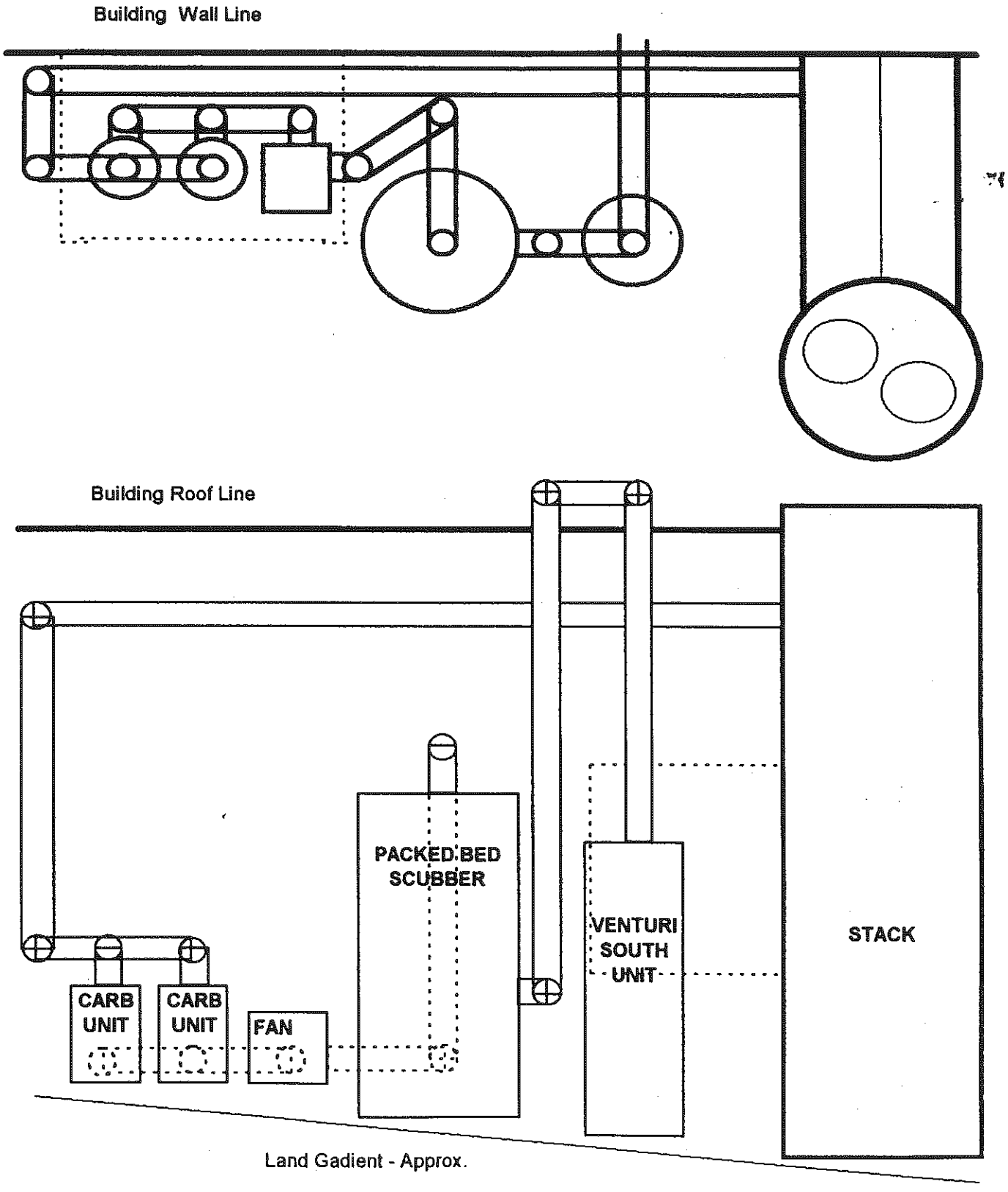
REV 00 - Initial Release	4/15/96
REV 01 - Updated	5/13/96
REV 02 - Updated	6/20/96

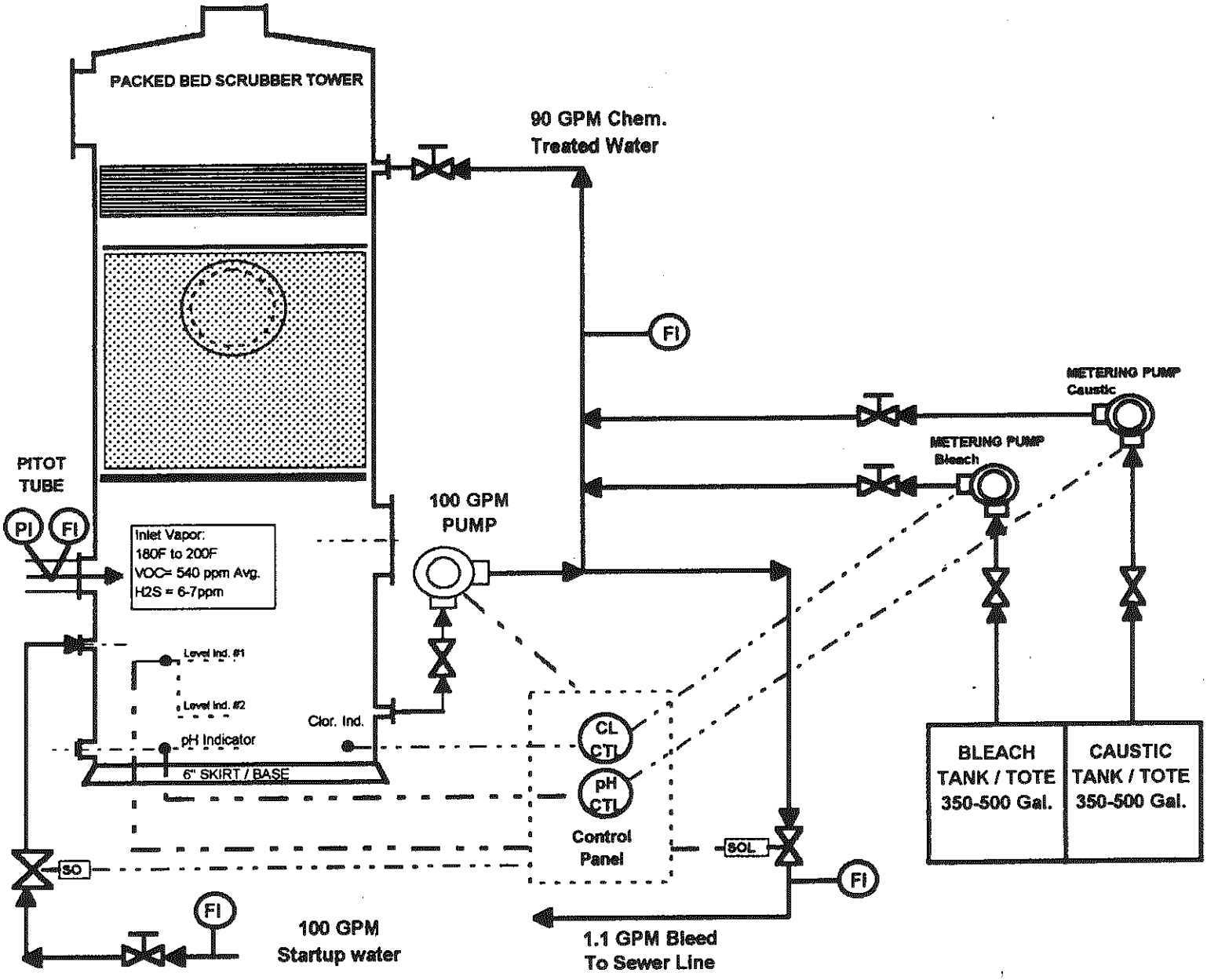
SCALE: = 10 FEET

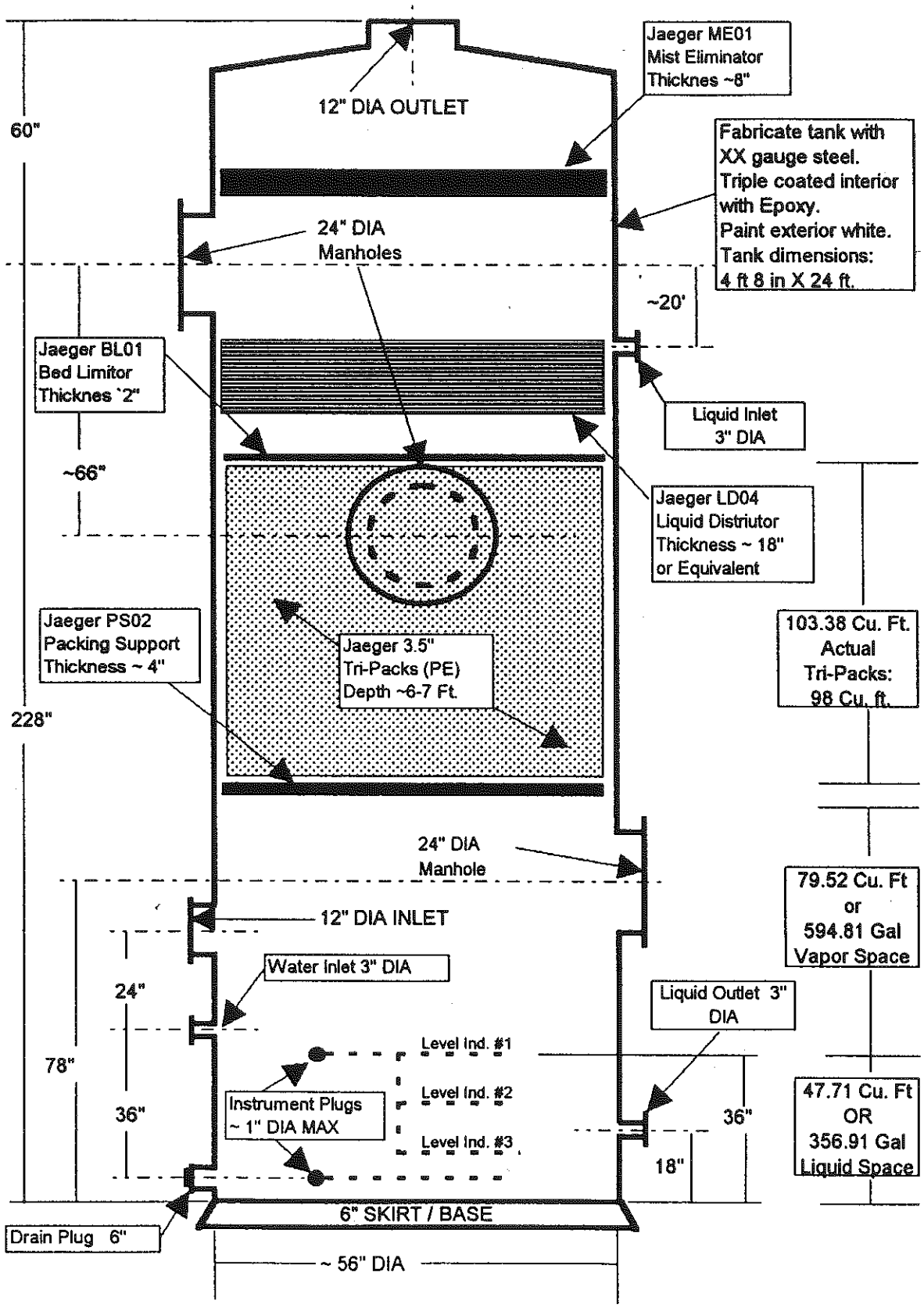
SYBILL, Incorporated

Plant Layout Drawing

ENG: G.N. Harasteanis April 15,1996


Building Wall Line
Building Roof Line
PACKED BED SCUBBER
VENTURI SOUTH UNIT
STACK
CARB UNIT
CARB UNIT
FAN
Land Gadient - Approx.


PACKED BED SCRUBBER TOWER
90 GPM Chem.
Treated Water
FI
METERING PUMP
Caustic
METERING PUMP
Bleach
PITOT
TUBE
PI
FI
Inlet Vapor:
180F to 200F
VOC= 540 ppm Avg.
H2S = 6-7ppm
100 GPM
PUMP
Level Ind. #1
Level Ind. #2
pH Indicator
Clor. Ind.
6" SKIRT / BASE
CL
CTL
pH
CTL
Control
Panel
SOL
SO
FI
100 GPM
Startup water
1.1 GPM Bleed
To Sewer Line
BLEACH
TANK / TOTE
350-500 Gal.
CAUSTIC
TANK / TOTE
350-500 Gal.


12" DIA OUTLET
Jaeger ME01
Mist Eliminator
Thicknes ~8"
60"
Fabricate tank with
XX gauge steel.
Triple coated interior
with Epoxy.
Paint exterior white.
Tank dimensions:
4 ft 8 in X 24 ft.
24" DIA
Manholes
~20'
Jaeger BL01
Bed Limitor
Thicknes `2"
Liquid Inlet
3" DIA
~66"
Jaeger LD04
Liquid Distriutor
Thickness ~ 18"
or Equivalent
Jaeger PS02
Packing Support
Thickness ~ 4"
Jaeger 3.5"
Tri-Packs (PE)
Depth ~6-7 Ft.
103.38 Cu. Ft.
Actual
Tri-Packs:
98 Cu. ft.
228"
24" DIA
Manhole
79.52 Cu. Ft
or
594.81 Gal
Vapor Space
12" DIA INLET
Water Inlet 3" DIA
24"
Liquid Outlet 3"
DIA
Level Ind. #1
78"
Level Ind. #2
Instrument Plugs
~ 1" DIA MAX
36"
36"
47.71 Cu. Ft
OR
356.91 Gal
Liquid Space
Level Ind. #3
18"
6" SKIRT / BASE
Drain Plug 6"
~ 56" DIA

SYBILL, INCORPORTATED

May 20,19..

PURCHASED	DESCRIPTION OF ITEM	INVOICE AMOUNT	CLASSIFICATION Water/Air	REMARKS
08/15/91	ELECTRICAL WORK BY TRIANGLE ELECTRIC	$ 38,815.00	Water	Process Electrical
08/15/91	ELECTRICAL WORK BY TRIANGLE ELECTRIC	$ 2,640.00	Water	Process Electrical
09/15/91	A - 1 SECURITY - ALARM SYSTEM	$ 1,606.05	Water	Building Security
10/21/91	CONCRETE WORK BY MRM COMPANY	$ 65,900.00	Water	Retention dikes for tanks
12/23/91	STEAM BOILER WORK BY J.E. GREEN CO.	$ 35,969.00	Water	Steam Piping for process
01/23/92	STEAM BOILER WORK BY J.E. GREEN CO.	$ 2,854.00	Water	Steam Piping for process
02/21/92	STEAM LINE WORK BY J. E. GREEN CO.	$ 4,688.00	Water	Steam Piping for process
03/31/92	CONCRETE EXTRAS BY MRM CONTRACTORS	$ 1,026.00	Water	Retention dikes for tanks
10/14/92	WELD BRKTS FOR TARPS (L & B WELD)	$ 4,500.00	Air	Odor Control
12/14/92	INSTALL 2" STEAM LINE-JOHN GREEN CO	$ 4,580.00	Water	Steam Piping for process
07/29/94	COVER SLUDGE TANKS-G.M. PAINTING	$ 6,000.00	Water	Process tanks covered
08/31/94	E.C.T. ENGINEERING	$ 6,248.56	Air/Water	Consult. & Eng. on process and air systems
08/31/94	E.C.T. ENGINEERING	$ 690.00	Air/Water	Consult. & Eng. on process and air systems
08/31/94	E.C.T. ENGINEERING	$ 9,290.42	Air/Water	Consult. & Eng. on process and air systems
08/31/94	E.C.T. ENGINEERING	$ 18,186.77	Air/Water	Consult. & Eng. on process and air systems
10/19/94	G&M PAINTING-COVER SLUDGE TANKS	$ 23,100.00	Water	Process tanks covered
08/18/94	E.C.T. ENGINEERING	$ 7,208.18	Air/Water	Consult. & Eng. on process and air systems
01/20/95	E.C.T. ENGINEERING	$ 3,724.33	Air/Water	Consult. & Eng. on process and air systems
09/24/91	FLOW METERS - ISCO, INC.	$ 6,905.60	Water	Monitoring Equipment
11/22/91	ELECTRODE SILVER SULFIDE-BAXTER	$ 646.76	Water	Monitoring Equipment
11/22/91	ROSS SUREFLOW PH ELECTRODE-BAXTER	$ 503.39	Water	Monitoring Equipment
10/27/92	VINYL COATED NYLON TARP-GOSPORT MFG	$ 2,646.98	Air	Odor Control
09/15/93	TANK, 30K GAL. 12"DIA.*35"-WASTE RED.	$ 7,000.00	Water	Wastewater process tanks
09/16/93	TANK, 30K GAL. 12"DIA.*35"-WASTE RED.	$ 7,000.00	Water	Wastewater process tanks
09/22/93	MACH & OPR. FOR TANKS-CASTLETON EQ	$ 980.00	Water	Wastewater process tanks
09/10/93	TRANSPORT TANKS-ART BROCKMAN INC.	$ 349.75	Water	Wastewater process tanks
09/24/93	TRANSPORT TANKS-ART BROCKMAN INC.	$ 231.00	Water	Wastewater process tanks
10/25/93	STEAM BOILER, SERIAL #9132-HARRISON PIPE	$ 11,021.92	Water	Process steam system
09/27/93	PIPING FOR STEAM BOILER-HARRISON PIPE	$ 2,588.36	Water	Process steam system
10/07/93	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 4,340.15	Water	Process steam system
10/20/93	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 4,193.84	Water	Process steam system
11/18/93	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 520.21	Water	Process steam system
11/18/93	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 7,197.25	Water	Process steam system
12/07/93	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 5,336.14	Water	Process steam system
01/06/94	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 14,517.50	Water	Process steam system
02/07/94	INSTALL & WELD STEAM BOILER-SAV'S WELDING	$ 13,959.33	Water	Process steam system

SYBILL, INCORPORTATED

May 20,1996

PURCHASED	DESCRIPTION OF ITEM	INVOICE AMOUNT	CLASSIFICATION Water/Air	REMARKS
02/28/94	HORNS FOR SCRUBBER SYS-G. BURGESS INC.	$ 5,512.00	Air	Venturi Scrubbers
05/06/94	CONE BOTTOM 15,000 GAL TANK-SAV'S WELDING	$ 11,500.00	Water	Process tank
05/18/94	FILTER UNITS FOR TANKS-FERGIN & ASSOCIATES	$ 2,770.18	Water	Inbound wastewater filters
05/31/94	FAB & DELIVER 2 SCRUBBER CANS-SAVS WELDING	$ 1,600.00	Air	Venturi scrubbers
05/31/94	WELDING WORK-SAVS WELDING	$ 7,176.98	Water	Process tanks & piping
05/31/94	WELDING WORK-SAVS WELDING	$ 4,935.04	Water	Process tanks & piping
06/15/94	WELDING WORK-SAVS WELDING	$ 2,706.51	Water	Process tanks & piping
06/15/94	CONE BOTTOM-SAVS WELDING	$ 11,500.00	Water	Process tanks & piping
06/15/94	CONE BOTTOM-SAVS WELDING	$ 11,500.00	Water	Process tanks & piping
06/30/94	THREE-26' LADDERS-SAVS WELDING	$ 6,725.00	Water	Process tanks
09/01/94	WELDING FOR OIL/WATER SEPERATOR-SAVS WELDIN	$ 3,108.75	Water	Wastewater separator
09/27/94	WATER/OIL SEPARATOR-3E, INC	$ 4,800.00	Water	Wastewater separator
09/01/94	HARD PIPING-MIPSCO	$ 1,266.99	Water	Process piping
09/01/94	HARD PIPING-MIPSCO	$ 3,339.55	Water	Process piping
09/28/94	INLINE MIXER-ARIES CHEMICAL	$ 1,687.91	Water	Process mixer
11/04/94	PIPING-MIPSCO	$ 282.89	Water	Process piping
11/16/94	PIPING-WT ANDREWS CO	$ 769.68	Water	Process piping
11/16/94	PIPING-WT ANDREWS CO	$ 1,018.40	Water	Process piping
11/28/94	PIPING-MIPSCO	$ 4,111.93	Water	Process piping
12/09/94	PIPING-MIPSCO	$ 2,967.14	Water	Process piping
12/08/94	OIL MOP-DYNACOM	$ 2,715.01	Water	Oil separator
12/05/94	HARD PIPING-G & M PAINTING ENTERPRISES	$ 12,544.00	Water	Process piping
01/23/95	HARD PIPING-G & M PAINTING ENTERPRISES	$ 17,634.00	Water	Process piping
03/14/95	LARGE TANK & PUMPS - BOB MODESTE	$ 7,700.00	Water	Process tank & pumps
03/22/95	VALVES & METERS - PROCESS INST & VALVE	$ 1,331.75	Air	Air Control System
05/04/95	JAGER PRODUCTS-AIR SCRUBBER EQ	$ 4,590.00	Air	Air Control System
05/04/95	JAGER PRODUCTS-AIR SCRUBBER EQ	$ 1,610.74	Air	Air Control System
05/16/95	TIGG-FILTERS FOR AIR SCRUBBER EQ	$ 23,940.73	Air	Air Control System
02/03/95	CASE BACKHOE	$ 8,000.00	Water	Process mixer
05/12/95	G&M PAINTING-FABRICATE METAL FOR SCRUBBERS	$ 32,974.00	Air	Air Control system
06/15/95	G&M PAINTING-DUCT WORK FOR SCRUBBER	$ 2,780.00	Air	Air Control system
06/02/95	PROCESS INSTRUMENT-SCRUBBER CONTROLS	$ 11,445.00	Air	Air Control system
04/20/95	TIGG CORPORATION-AIR SCRUBBER	$ 1,172.00	Air	Air Control system
05/31/95	CREATIVE SCIENCE INC-LAB EQUIPMENT	$ 2,750.00	Water	Lab equipment
07/21/95	G&M PAINTING-DUCT WORK FOR SCRUBBER	$ 2,800.00	Air	Air Control System
08/18/95	DETROIT PUMP-4" GORMAN-RUPP PUMP	$ 4,433.28	Water	Process pump

PURCHASED	DESCRIPTION OF ITEM	INVOICE AMOUNT	CLASSIFICATION Water/Air	REMARKS
12/01/95	DOUG CARTER-24" FILTER PRESS	$ 2,500.00	Water	Process filter press
12/01/95	KOMATSU FORKLIFT	$ 4,000.00	Water	Sludge box mover
	Total Capital Expenditure	$ 561,163.95		
	Total Capital Expenditure classified as Water		**$ 418,912.49**	
	Total Capital Expenditure classified as Air		**$ 96,903.20**	
	Total Capital Expenditure classified as Air / Water		**$ 45,348.26**	
01/07/91	Property & Process Buildings (See Attached)	$ 526,635.47		
	Total Cost of the Facility as of 12/31/95	$ 1,087,799.42		

AIR POLLUTION CONTROL DIVISION
MAIN OFFICE
640 Temple Street, Suite 700
Detroit, Michigan 48201
(313) 832-5000
FAX: (313) 832-5066
DOWNRIVER OFFICE
Eureka Road
231 Eureka Road
Wyandotte, Michigan 48192
(313) 281-8396
FAX: (313) 281-6973

DEPARTMENT OF PUBLIC HEALTH
WAYNE COUNTY

RECEIVED
JAN 3 1995

EDWARD H. McNAMARA
County Executive
Bernard N. Kilpatrick
Assistant County Executive
Cynthia Taueg, MPH
Director-Health Officer
Donald Lawrenchuk, M.D., MPH
Medical Director

December 12, 1994

CONFIRMATION COPY

Mr. Vasilios C. Madias, President
Sybill, Incorporated
111 Military Avenue
Detroit, Michigan 48209

SUBJECT: PERMIT CONDITIONS - AGREEMENT BY COUNTER SIGNATURE

PERMIT NUMBERS: C-10504 THROUGH C-10519
SOURCE DESCRIPTION: INSTALLATION OF SEVEN NON-HAZARDOUS LIQUID WASTE PROCESSING TANKS (NO. 9, 11, 12, 14, 15, 16 & 17), THREE PRODUCT OIL STORAGE TANKS (NO. 3, 4, 10), TWO INCOMING WASTE OIL STORAGE TANKS (NO. 1 & 2), WASTE WATER STORAGE TANK NO. 5 (CLARIFIER), TWO VENTURI SCRUBBERS (NO. 1 & 2), A PACKED BED CAUSTIC SCRUBBER, AND TWO PARALLEL ACTIVATED CARBON ADSORBERS
SOURCE LOCATION: 111 MILITARY AVENUE, DETROIT

Dear Mr. Madias:

We have completed our review of the installation permit applications for compliance with all applicable Federal, State and Wayne County air pollution control regulations, rules and ordinances. We shall approve these permit applications subject to the following general conditions and with written concurrence by your organization with the following special conditions. Your written concurrence signifies your acknowledgement of and agreement to the special conditions.

GENERAL CONDITIONS

1. Not more than 30 days after completion of the installation, the applicant shall apply, in writing, for a Certificate of Operation. Written application should be sent to: Director of Enforcement Services, Wayne County Department of Public Health, Air Pollution Control Division, 640 Temple Street, Suite 700, Detroit, Michigan 48201-2558.

2. Trial operation of this emission source shall be allowed for 90 days, provided such operation is in compliance with all of the terms and conditions contained in the installation permit. If a Certificate of Operation has not been issued for an emission source prior to the expiration of the trial operation period, an extension of trial operation may be requested of the Division Director.

3. Operation of the emission source shall permanently cease upon denial of the Certificate of Operation by this Division. Denial of a Certificate of Operation is an appealable action pursuant to Section 1401(A) of the Wayne County Air Pollution Control Ordinance, hereinafter "Ordinance", as amended.

4. The applicant shall demonstrate compliance with all Ordinance requirements, other applicable State and Federal air pollution regulation requirements, and with all general and special conditions of this permit prior to the issuance of the Certificate of Operation.

5. The applicant shall not reconstruct, alter, modify, expand or relocate this emission source unless plans, specifications and an application for an installation permit are submitted to and approved by this Division.

6. No emission source shall be operated for any other purpose or in any other manner than that for which the installation permit was approved and for which a Certificate of Operation has been issued unless otherwise authorized in writing by the Division. Such emission source shall also be maintained in a state of good repair to ensure compliance with all Ordinance requirements, other applicable State and Federal air pollution regulation requirements, and with all general and special conditions of this permit.

7. Operation of this emission source shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.

8. Operation of this emission source shall not interfere with the attainment or maintenance of the air quality standard for any air contaminant.

9. Operation of this emission source shall not result in significant deterioration of air quality.

10. The applicant shall provide notification of any abnormal conditions or malfunction of process or control equipment covered by this application, resulting in emissions in violation of the Ordinance or of any permit conditions for more than two hours, to the Enforcement Section of this

Division. Such notice shall be made as soon as reasonably possible, but not later than 9:00 a.m. of the next working day. The applicant shall also, within 10 days, submit to the Enforcement Section of this Division a written detailed report, including probable causes, duration of violation, remedial action taken and the steps which are being undertaken to prevent a reoccurrence.

11. Approval of this application does not preclude the applicant from complying with any future regulations which may be promulgated.

12. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

13. Act No. 53 - Applicant shall notify any public utility of any excavation, tunneling and discharging of explosives or demolition of buildings which may affect said utility's facilities in accordance with Act 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act.

14. The restrictions and conditions of this installation permit shall apply to any person or legal entity which now or shall hereafter own or operate the emission source for which this installation permit is issued. Any new owner or operator shall immediately notify the Director of the Enforcement Section, in writing, of such change in ownership or principal operator status of this emission source.

15. If the installation, reconstruction, relocation or alteration of the emission source for which this permit has been approved has not commenced within, or has been interrupted for, 18 consecutive months, this permit shall be revoked in writing, with the notice of revocation sent to the applicant by certified mail, unless otherwise authorized by this Division.

16. Except as allowed by Michigan Public Act 348 of 1965, as amended, Administrative Rule 285 (a), (b), and (c), applicant shall not substitute any fuels, coatings, or raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by this Division.

SPECIAL CONDITIONS

17. Applicant shall not receive or process any hazardous wastes, as outlined in the Code of Federal Regulations, Title 40, Part 261, Subparts C and D, nor any hazardous wastes, as outlined in the Michigan Act 64 (Public Act of 1979, as amended).

18. Applicant shall not receive any waste oil stream with a volatile organic compound (VOC) content greater than 0.15 percent by weight (1,500 ppm) nor any detectable level of polychlorinated biphenyl (PCB), as determined by a test method acceptable to the Division. Analyses of the incoming waste streams (including VOC, PCB, & reactive sulfur) shall be kept on record for a period of at least two years following the date of such record and made available to the Division upon request.

19. The total amount of non-hazardous wastes received at the applicant's facilities at 111 Military, Detroit, shall not exceed 280,000 gallons per calendar day.

20. Dampers in the exhaust duct from any tanks shall be in the closed position during cleaning and maintenance of those tanks. All tank openings such as manways and hatches shall be kept closed, except during cleaning and maintenance of the tanks.

21. On and after June 15, 1995, applicant shall not process any waste oil unless the venturi scrubber Nos. 1 and 2, the packed bed caustic scrubber, and the activated carbon adsorption units, hereinafter "control system", are installed and operating properly.

22. Visible emissions from the waste storage tanks, process tanks, and the control system shall not exceed zero percent opacity.

23. The exhaust gases from the control system shall be discharged unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 17 inches at an exit point not less than 55 feet above ground level.

24. The hydrogen sulfide (H_2S) emissions from the control system shall not exceed 0.43 milligrams per cubic meter of exhaust air nor 6.5×10^{-5} pound per hour.

25. The total VOC emissions from the control system shall not exceed 0.01 pound per hour nor 103 pounds per year.

26. Odor emissions from the control system shall not exceed 50 odor units per cubic foot of exhaust gas.

27. Within the period from June 15, 1995 through September 15, 1995, verification of the emissions specified in the special conditions 24 and 25, from the control system, by testing, at owner's expense, in accordance with test methods outlined in the Code of Federal Regulations, Title 40, Part 60, Appendix A, shall be required for operating approval. All tests shall be performed in a manner representative of worst case actual operating conditions. Verification of emissions includes the submittal of a complete report of the test results. No less

than 30 days prior to the testing, a complete stack testing plan shall be submitted to the Director of Enforcement Services of the Division. The final plan must be approved by the Division prior to testing.

28. Within the period from June 15, 1995 through September 15, 1995, verification of the emissions specified in the special condition 26, from the control system, by testing, at owner's expense, in accordance with the modified ASTM syringe method D-1391, shall be required for operating approval. All tests shall be performed in a manner representative of worst case actual operating conditions. Verification of emissions includes the submittal of a complete report of the test results. No less than 30 days prior to the testing, a complete stack testing plan shall be submitted to the Director of Enforcement Services of the Division. The final plan must be approved by the Division prior to testing.

29. After a determination by and a written notification letter from the Division Director that emissions from the facility are causing unreasonable interference with the common public right to live free from foul or noxious odors, the applicant shall have an opportunity to meet with the Division to propose a plan of action to abate the odor problem. The scheduled meeting should be held within 10 days of the sending of the Division Director's notification letter. The applicant shall then have 20 additional days to submit to the Division and to implement an acceptable odor abatement program for permanent resolution of the odor problem. Nothing in this condition shall be considered to diminish the Division's rights to pursue other enforcement actions permitted by law.

30. The Division reserves the authority to conduct or require any reasonable odor testing or other pollutant testing (in accordance with the Michigan Act 348, Administrative Rules 336.2001 and 336.2002) at the waste oil treatment tanks, storage tanks, and control system at the owner's expense. Any required test shall be performed within 60 days following the receipt of written notification from the Division, unless otherwise authorized by the Division, utilizing methods acceptable to this Division (Rule 336.2003) and with prior Division approval. Also, in accordance with the Michigan Act 348, Section 16a, the Division reserves the authority to sample or monitor at reasonable times, inspect any equipment, have access to and copy records for compliance.

31. Temperature of the waste material in the oil processing Tank Nos. 9, 11, 12, 14, 15, 16, and 17 shall not exceed 200° Fahrenheit.

32. The acidification of waste material shall only be done in process Tank Nos. 9 and 14, and shall only be done in accordance with methods, procedures, and specifications accepted by the Division, in writing.

33. By March 30, 1995, applicant shall install and maintain permanent covers on product storage Tank Nos. 3 and 4 so as to prevent odor emissions to the ambient air. The tanks shall be vented to the control system or alternative standalone control acceptable to the Division by June 15, 1995.

34. Applicant shall only use Tank No. 5 (waste water clarifier tank) for storage of treated waste water, which is ready to be discharged to the municipal sewer systems. If Tank No.5 creates any odor nuisance, then it shall be equipped with a fixed cover and the emissions shall be vented to the control system within 90 days of notification from the Division.

35. Applicant shall maintain a minimum water flow rate of 100 gallons per minute at a pressure no less than 100 pounds per square inch (psig), to the venturi scrubber Nos. 1 and 2. The venturi scrubbers shall be equipped with a flow meter to verify the water flow rate.

36. Exhaust air flow rate from the packed bed caustic scrubber shall not exceed 6,000 cubic feet per minute.

37. The packed bed caustic scrubber liquid circulation rate shall be a minimum of 85 gallons per minute. The packed bed caustic scrubber shall be equipped with a flow meter to verify this circulation rate.

38. The packed bed caustic scrubber shall be filled with 2.75 inch size TELPAC polypropylene packing medium in a packing bed with minimum dimensions of 4 feet 6 inches in diameter and 6 feet in depth.

39. Exhaust gas temperature from the packed bed caustic scrubber shall not exceed 105° Fahrenheit.

40. The hydrogen sulfide concentration in the influent gases to the packed bed caustic scrubber shall not exceed 0.61 percent by volume on a wet basis.

41. The temperature of the influent gases to the packed bed caustic scrubber shall not exceed 180° Fahrenheit.

42. The packed bed caustic scrubber shall maintain a minimum H_2S control efficiency of 99 percent or as required in condition 24.

43. Applicant shall measure the wet-bulb and dry-bulb temperatures of the influent gases to the packed bed caustic scrubber with instrumentation acceptable to the Division. Water vapor content in the influent gases to the packed bed caustic scrubber shall not exceed 6 percent by volume. Analysis of the moisture content of the influent gases to the packed bed caustic scrubber shall be performed and recorded once per hour

until such time as the applicant demonstrates, using at least 120 days actual operating data, that the analysis done once per day is sufficient for proper operation of the packed bed caustic scrubber. With Division approval of this demonstration, the analysis shall be performed and recorded at least once per operating day instead of once per hour.

44. An automatic feed system shall be utilized for caustic addition to the packed bed caustic scrubber solution, which shall maintain a feed rate of 1.05 gallons per minute of 50 percent by weight caustic solution, or equivalent quantity and strength.

45. Fresh water make-up to the packed bed caustic scrubber shall be supplied at a rate sufficient to maintain a constant liquid level in the packed bed caustic scrubber reservoir, while maintaining a continuous, minimum scrubbing solution blowdown (purge) directly to the municipal sewer systems, at a rate of 7.5 gallons per minute. Such blowdown rate shall be measured on a continuous basis with, instrumentation acceptable to the Division.

46. The carbon adsorbers shall maintain a minimum VOC control efficiency of 99 percent or as required in condition 25.

47. Applicant shall equip and maintain each carbon adsorber with a monitor capable of detecting breakthrough of the carbon.

48. Applicant shall monitor each carbon adsorber for breakthrough, at least once every day, and shall immediately replace the spent carbon adsorber if breakthrough is detected or direct all the emissions through the optional (stand-by) carbon adsorber units. If stand-by carbon adsorber units are not available, then applicant shall cease all operations as soon as possible, consistent with safe operating practices, until the carbon adsorption units are replaced with fresh carbon.

49. Applicant shall keep a written log of the time and date of carbon adsorber replacement for a period of at least two years following the date of such record. This information shall be made available to the Division upon request.

50. A written log shall be kept, with two entries during one operating shift (at an interval of six hours), of the inlet and outlet gas stream temperatures, the inlet and outlet circulating absorbent liquid temperatures in the packed bed caustic scrubber, and the packed bed caustic scrubber solution blowdown rate. This log shall be kept on file for a period of at least two years following the date of such record and shall be made available to the Division upon request.

51. Applicant shall install magnahelic pressure gauges on the vent pipes of storage Tank Nos. 1, 2, 3, 4, and 10. Vent pipes shall be maintained at a 3 inch (W.C.) negative pressure,

WAYNE COUNTY DEPARTMENT OF PUBLIC HEALTH
Air Pollution Control Division
Staff Activity Report

October 27, 1994

Applicant

Sybill, Inc.
111 Military Avenue
Detroit, Michigan

Wayne County Installation Permit Numbers: C-10504 through C-10519
Installation of an odor control system and used oil reclamation process equipment at an existing used oil processing facility.

Significant Dates

August 5, 1991	Installation Permit Applications submitted for a total of five waste oil/water storage and treatment tanks (C-9915 through C-9919).
January 28, 1992	Letter sent to Sybill, stating that no permit would be required based on a oil treatment process without acidification and potential for any odor.
January 28, 1992 through August 4, 1992	Plant visits, discussions, additional information request, and submittal.
August 19, 1992	Re-submittal of Installation Permit Applications for five waste oil/water treatment and storage tanks.
March 8, 1993	Sybill submitted an odor control plan.
July 21, 1993	Notification to Sybill, stating that all permit review activities had been suspended pending Sybill's submittal of an acceptable odor control system.
July 28, 1994	Letter to Sybill listing the deficiencies in the Installation Permit Applications
May 25, 1994	Issuance of cease and desist order to Sybill until effective odor control plan is submitted and approved.
June 14, 1994	Additional permit applications received
July 7, 1994	Revised permit information package received - proposed odor control system and modified waste oil treatment process.
September 30, 1994	Permit applications considered complete, and draft permit conditions prepared.

CERTIFIED MAIL

Detroit Water and Sewerage Department
Industrial Waste Control
303 South Livernois
Detroit, Michigan 48209
(313) 297-9400

Coleman A. Young, Mayor
City of Detroit

October 8, 1993

Mr. Vasilios C. Madias
Sybill Inc.
400 Town Center, Suite 300
Dearborn, Michigan 48126

Dear Mr. Madias:

Re: Industrial Wastewater Discharge Permit Draft

Enclosed please find a copy of the permit draft for your facility at 111 Military in Detroit, MI. Please review each section of the permit for accuracy. Should you request a reconsideration to the contents of the permit, please contact us in writing within 20 days of receipt of this letter.

Should we not hear from you within the 20 day review period, we will consider the permit accepted as issued, and will forward the signed original to you.

Thank you for your cooperation. If we may be of any further assistance, please contact Mr. Ashutosh Rai of the Industrial Waste Control, Permits Section at 297-9218 or myself at 297-9401.

Sincerely,

Stephen J. Kuplicki
Manager, IWC

SJK/AAR/ls

Detroit Water and Sewerage Department
Industrial Waste Control
303 South Livernois
Detroit, Michigan 48209
(313) 297-9400

Coleman A. Young, Mayor
City of Detroit

DETROIT

WATER AND SEWERAGE DEPARTMENT

WASTEWATER DISCHARGE PERMIT - TYPE 3

Section A: General Information: Permit No.: 914-003

Company Name: Sybill Inc.

Premise Address: 111 Military

City: Detroit , MI Zip Code: 48209

Mailing Address: 400 Town Center, Suite 300

City: Dearborn , MI Zip Code: 48126-4102

Primary Standard Industrial Classification (SIC) Code: 2992

Other SIC Codes:

The above Industrial User is authorized to discharge industrial wastewater to the City of Detroit sewer system in compliance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is granted in accordance with the application filed in the office of the Director of DWSD, and in conformity with plans, specifications, and other data submitted to the City in support of the above application.

Effective Date: September 2, 1993

Expiration Date: September 1, 1996

DRAFT

Charlie J. Williams
Director

DRAFT

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Representative Sampling Location: MH in Sampling Shack; 15' E. of incinerator bldg., 3' N. of N. containment wall.

Local Ordinance Limits

PARAMETER	DAILY MAXIMUM (mg/l)	SELF-MONITORING REQUIRED (Y/N)
Total Arsenic (As)	1.0	Y
Total Cadmium (Cd)	2.0	Y
Total Copper (Cu)	4.5	Y
Total Cyanide (CN)	2.0	Y
Total Iron (Fe)	1000.0	Y
Total Lead (Pb)	1.0	Y
Total Mercury (Hg)	0.005	Y
Total Nickel (Ni)	5.0	Y
Total Silver (Ag)	2.0	Y
Total Chromium (Cr)	25.0	Y
Total Zinc (Zn)	15.0	Y
Total Toxic Organic (TTO)	*	Y
PCB - Arochlor 1260	0.0005	Y
Total PCB	0.001	Y
Phenol	0.5	Y
Fats, Oil, Grease (FOG)	2000	Y
Total Suspended Solids (TSS)	10000	Y
Biochemical Oxygen Demand (BOD)	10000	Y
Phosphorus (P)	500	Y
pH	5.0 - 10.5 (units)	Y

Other Requirements:

(1) Compliance with the General Pollutant Prohibitions

(2) pH between 5.0 - 10.0 (10.5 if alkalinity is less than 300 ppm)

All limitations are based on composite samples, except for FOG, CN, and pH, which are based on grab samples.

Please refer also to Sections C and D-3 regarding self-monitoring and reporting requirements.

*Daily maximum limitation not finalized, self monitoring is required.

DRAFT

SECTION C: SELF-MONITORING REQUIREMENTS

Monitoring frequencies for all significant industrial users will be determined based upon (i) their permit classification, and (ii) the discharge volume of process wastewater.

Noncategorical Industrial Users (Permit Type 3) shall be required to provide analytical data sufficient to demonstrate compliance with the daily maximum limitations, as defined in Section B of this permit, within a single reporting period.

1) Reporting periods for analytical testing shall be as follows:

(X) a. Facilities discharging >25,000 gpd process water shall perform a minimum of one (1) wastewater analysis (as defined above) per quarter.

( ) b. Facilities discharging <25,000 gpd process water shall perform a minimum of one (1) wastewater analysis (as defined above) per six month period.

2) These results shall be submitted every six (6) months on or before June 30, and December 31 of each year as part of the Six-Month Reporting Requirement.

3) Sampling must be performed for all the parameters identified in Section B of this permit and sampled in accordance with approved methods. Samples must be taken from the location identified in Section B. Use of an alternate location is not acceptable unless concurrence is received from DWSD. Contact DWSD in writing if you wish to request use of an alternate location.

Grab samples must be used for pH, cyanide, total phenols, fats, oil and grease (FOG), sulfide, and volatile organics. All other pollutants should be collected by flow-proportional sampling techniques, or time composite sampling. A minimum of four (4) grab samples must be obtained for a representative time composite sample.

4) If sampling performed by an Industrial User indicates a violation of the permit limitations, then

(i) Notification must be made to the Control Authority within 24 hours of becoming aware of the violation, and

(ii) Repeat the sampling and analysis, and submit the results of at least two (2) repeated analysis to the DWSD within 30 days of becoming aware of the violation.

5) Any Industrial User who monitors any pollutants more frequently than defined in paragraph 1, shall include the results of this analysis within the six-month report defined in paragraph 2.

6) Those users who use the data taken by DWSD for their Six Month Report submissions are encouraged to perform additional independent analyses of the wastewater discharge.

DRAFT

SECTION D: COMPLIANCE REQUIREMENTS

1) Compliance Agreement

Should the permittee currently be under Compliance or Administrative Order and/or enter into a Compliance Agreement at a future date, that order or agreement shall automatically become a part of this permit. Therefore, any requirement stipulated shall be adhered to as a permit requirement.

2) Slug Control/Spill Prevention Plan (SC/SPP)

The permittee is required to submit a Slug Control/Spill Prevention Plan (SC/SPP) in accordance with City of Detroit guidelines, to provide protection against accidental discharges to the POTW. If an acceptable Slug Control/Spill Prevention Plan has not been submitted, or if there are questions regarding your facility's status, the permittee should contact the Emergency Response Group at 297-9489.

Note: Please disregard this section if your facility has been granted an exemption from the Slug Control/Spill Prevention Plan requirement.

3) Reporting Requirements

A Six Month Discharge Report shall be submitted biannually to the Department by June 30 and December 31 of each year.

The report shall be signed, dated, and certified by an authorized representative of the Industrial User, or a registered professional engineer who is knowledgeable of the facility's discharge, and submitted in accordance with the Department's Guidance Requirements.

This report shall include:

(i) Wastewater Analyses (as identified in Section C)

(ii) Report whether the applicable pretreatment standards are being met on a consistent basis and, if not, what additional operation and maintenance practices and/or pretreatment construction is necessary to bring the Industrial User into compliance.

(iii) The following additional requirement.

Your next Six-Month Report is due by December 31, 1993.

PERMIT DEFINITION

1. FACILITY AND PROCESS DESCRIPTION:
This is a centralized waste treatment facility that accepts pre-qualified non-hazardous wastewater, oil and coolants. Wastewater received with a 50% or greater oil content is pumped directly into tank #1, if less than 50% it is pumped into tank #2. Both of these storage tanks hold approximately 250,000 gallons. Oil is skimmed off the top of tank #2 and transferred to tank #1 via a welden M8 air pump at a rate of 80 gpm.

Heat will be introduced into tanks #1 and #2 to promote greater separation of this oil and water phase. Furthermore, silicates will be used to further enhance oil recovery. The oil from tank #1 will then be hauled out and sold for reclamation on its suitability for discharge. If the analysis shows that the treated water is ready for discharge it is then transferred to tank #5 (approximate capacity 170,000 gal.) via a Welden Air Pump for ultimate discharge.

2. PROCESS WASTEWATER:
The wastewater that this facility receives and processes will be non-hazardous, non-categorical wastewater coolants, wash waters and leachate water.

No materials that are subject to the National Categorical Pretreatment Standards may be mixed with the other non-categorical wastes, and discharged under the local limits defined in this permit. A new permit application will be necessary, and detailed information provided on the amounts of the categorical wastestreams so that appropriated more stringent effluent limits be applied for this facility. Discharge is expected to be initially approximately 500,000 - 750,000 gallons per month.

The water is pumped from the bottom of tank #2 into tank #3 with a Warren J-40X5 ext. screw pump via 8" overhead line to treatment tank #3, or tank #4 at the rate of 290 gallons per minute (tanks #3 and #4 capacities are approximately 360,000 gallons each).

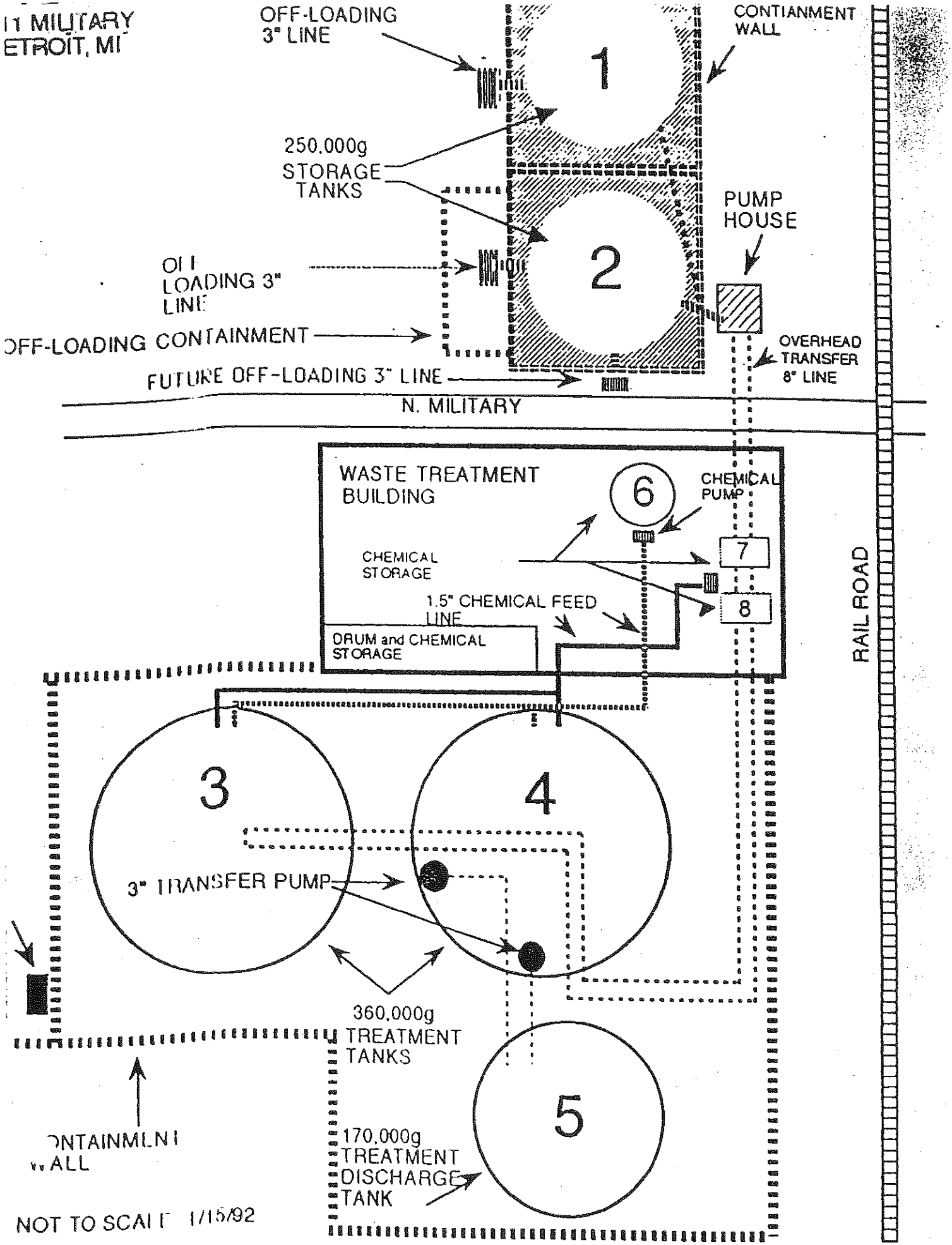
PERMIT DEFINITION
(Continued)

2. PROCESS WASTEWATER: (Continued)
Once the wastewater is in the treatment tanks, water is agitated for complete mixing. A sample is then obtained for bench testing in order to determine the most effective treatment. Sulfuric Acid is added to lower the pH to 2.75, in a 20,000 gallon batch; this is about 35 to 60 gallons and takes approximately 45 minutes. The tank is then agitated for 30 to 45 minutes which aids in dissolving metals. Hydrogen peroxide is then introduced to dispose of the Organics into sludge, 1 to 15 gallons with a mixing time of approximately 30 minutes. Aluminum Sulfate is then added to bring all oils and flocculent to the top. Two to three 100 lb. bags are used with a mixing time of approximately 30 minutes.

Finally, oil and flocculent are skimmed from the top, leaving the treated water ready for analysis and determination.

3. APPLICABLE CLASSIFICATION:
This facility is classified as a Significant Industrial User based on the furnished information and as per City Ordinance No. 23-86, Section 56-3-58.

AAR/ls


11 MILITARY
ETROIT, MI
OFF-LOADING
3" LINE
CONTIANMENT
WALL
1
250,000g
STORAGE
TANKS
PUMP
HOUSE
2
OIL
LOADING 3"
LINE
OFF-LOADING CONTAINMENT
OVERHEAD
TRANSFER
8" LINE
FUTURE OFF-LOADING 3" LINE
N. MILITARY
WASTE TREATMENT
BUILDING
6
CHEMICAL
PUMP
CHEMICAL
STORAGE
7
8
1.5" CHEMICAL FEED
LINE
DRUM and CHEMICAL
STORAGE
RAIL ROAD
3
4
3" TRANSFER PUMP
360,000g
TREATMENT
TANKS
5
170,000g
TREATMENT
DISCHARGE
TANK
ONTAINMENT
WALL
NOT TO SCALE 1/15/92

DRAFT

TOTAL TOXIC ORGANIC (TTO)

No.	PARAMETER TOXIC ORGANIC
++++ ++++	PURGEABLE COMPOUNDS ++++++++++++++++++++++++++++
1	Acrolein
2	Acrylonitrile
3	Benzene
4	Carbon Tetrachloride (Tetrachloromethane)
5	Chlorobenzene
6	1,2-Dichloroethane
7	1,1,1-Trichloroethane
8	1,1-Dichloroethane
9	1,1,2-Trichloroethane
10	1,1,2,2-Tetrachloroethane
11	Chloroethane
12	2-Chloroethyl vinyl ether
13	Chloroform (Trichloromethane)
14	Tetrachloroethylene
15	Toluene
16	Trichloroethylene
17	Chloroethylene (Vinyl Chloride)
18	1,1-Dichloroethylene
19	1,2-Trans-dichloroethylene
20	1,2-Dichloropropylene (1,2-Dichloropropene)
21	1,3-Dichloropropylene (1,3-Dichloropropene)
22	Ethylbenzene
23	Dichloromethane (Methylene Chloride)
24	Chloromethane (Methyl Chloride)
25	Bromomethane (Methyl Bromide)
26	Tribromomethane (Bromoform)
27	Dichlorobromomethane
28	Chlorodibromomethane
29	1,2-Dichlorobenzene
30	1,3-Dichlorobenzene
31	1,4-Dichlorobenzene
32	Xylene
++++ ++++	EXTRACTBLE COMPOUNDS ++++++++++++++++++++++++++++
33	Acenaphthene
34	Acenaphthylene
35	Anthracene
36	Benzidine
37	Bis (2-Chloroethoxy) methane
38	Bis (2-Chloroethyl) ether
39	Bis (2-Chloroisoproply) ether
40	Bis (2-Ethylhexyl) phthalate
41	Butyl benzyl phthalate
42	Chrysene
43	Di-n-butyl phthalate
44	Di-n-octyl phthalate
45	Diethyl phthalate
46	Dimethyl phthalate
47	Fluorene
48	Hexachlorobenzene
49	Hexachlorobutadiene
50	Hexachlorocyclopentadiene
51	Hexachloroethane
52	Isophorone
53	Naphthalene
54	Nitrobenzene
55	N-nitrosodimethylamine

RESPONSE ITEM 1

Detroit Water and Sewerage Department
Industrial Waste Control
303 South Livernois
Detroit, Michigan 48209
(313) 297-9400

Coleman A. Young, Mayor
City of Detroit

DETROIT

WATER AND SEWERAGE DEPARTMENT

WASTEWATER DISCHARGE PERMIT - TYPE 3

Section A: General Information: Permit No.: 914-003

Company Name: Sybill Inc.

Premise Address: 111 Military

City: Detroit , MI Zip Code: 48209

Mailing Address: 400 Town Center, Suite 300

City: Dearborn , MI Zip Code: 48126-4102

Primary Standard Industrial Classification (SIC) Code: 2992

Other SIC Codes:

The above Industrial User is authorized to discharge industrial wastewater to the City of Detroit sewer system in compliance with the City's Wastewater Discharge Ordinance or equivalent local ordinance and any applicable provisions of federal or state law or regulation, and in accordance with discharge point(s), effluent limitations, monitoring requirements, and other conditions set forth herein.

This permit is granted in accordance with the application filed in the office of the Director of DWSD, and in conformity with plans, specifications, and other data submitted to the City in support of the above application.

Effective Date: September 2, 1993

Expiration Date: September 1, 1996

DRAFT

Charlie J. Williams
Director

SECTION C: SELF-MONITORING REQUIREMENTS

Monitoring frequencies for all significant industrial users will be determined based upon (i) their permit classification, and (ii) the discharge volume of process wastewater.

Noncategorical Industrial Users (Permit Type 3) shall be required to provide analytical data sufficient to demonstrate compliance with the daily maximum limitations, as defined in Section B of this permit, within a single reporting period.

1) Reporting periods for analytical testing shall be as follows:

   (X) a. Facilities discharging >25,000 gpd process water shall perform a minimum of one (1) wastewater analysis (as defined above) per quarter.

   ( ) b. Facilities discharging <25,000 gpd process water shall perform a minimum of one (1) wastewater analysis (as defined above) per six month period.

2) These results shall be submitted every six (6) months on or before June 30, and December 31 of each year as part of the Six-Month Reporting Requirement.

3) Sampling must be performed for all the parameters identified in Section B of this permit and sampled in accordance with approved methods. Samples must be taken from the location identified in Section B. Use of an alternate location is not acceptable unless concurrence is received from DWSD. Contact DWSD in writing if you wish to request use of an alternate location.

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DRAFT

Sybill Inc.
111 Military
Detroit, MI 48209

SECTION D: COMPLIANCE REQUIREMENTS

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This report shall include:

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(ii) Report whether the applicable pretreatment standards are being met on a consistent basis and, if not, what additional operation and maintenance practices and/or pretreatment construction is necessary to bring the Industrial User into compliance.

(iii) The following additional requirement.

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PERMIT DEFINITION
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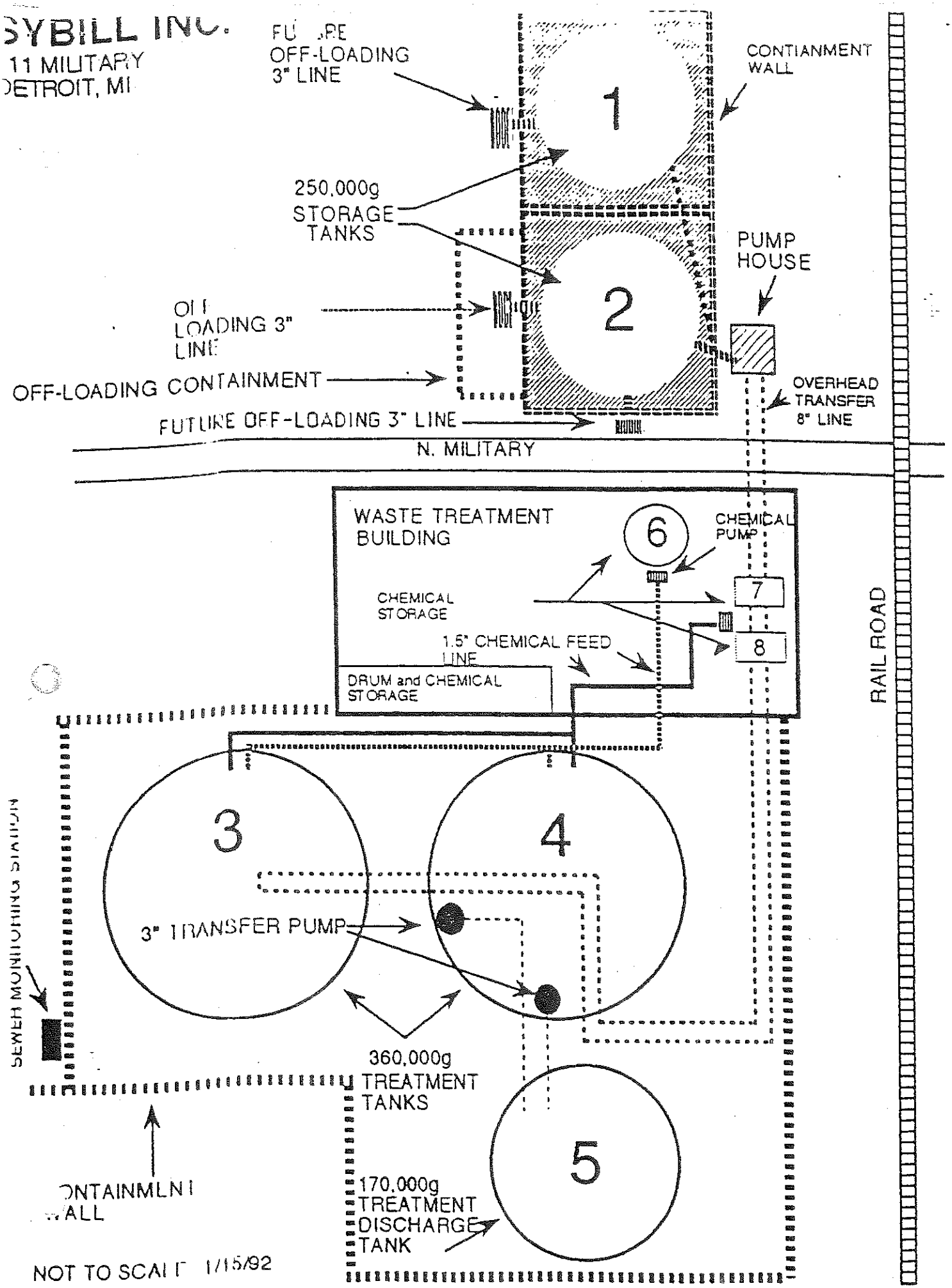
AAR/ls

SYBILL INC.
11 MILITARY
DETROIT, MI



DRAFT

Sybill Inc.
111 Military
Detroit, MI 48209

New
Date: 10/08/93

Permit No. 914-003

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

Representative Sampling Location: MH in Sampling Shack; 15' E. of incinerator bldg., 3' N. of N. containment wall.

Local Ordinance Limits

PARAMETER	DAILY MAXIMUM (mg/l)	SELF-MONITORING REQUIRED (Y/N)
Total Arsenic (As)	1.0	Y
Total Cadmium (Cd)	2.0	Y
Total Copper (Cu)	4.5	Y
Total Cyanide (CN)	2.0	Y
Total Iron (Fe)	1000.0	Y
Total Lead (Pb)	1.0	Y
Total Mercury (Hg)	0.005	Y
Total Nickel (Ni)	5.0	Y
Total Silver (Ag)	2.0	Y
Total Chromium (Cr)	25.0	Y
Total Zinc (Zn)	15.0	Y
Total Toxic Organic (TTO)	*	Y
PCB - Arochlor 1260	0.0005	Y
Total PCB	0.001	Y
Phenol	0.5	Y
Fats, Oil, Grease (FOG)	2000	Y
Total Suspended Solids (TSS)	10000	Y
Biochemical Oxygen Demand (BOD)	10000	Y
Phosphorus (P)	500	Y
pH	5.0 - 10.5 (units)	Y

Other Requirements:

(1) Compliance with the General Pollutant Prohibitions

(2) pH between 5.0 - 10.0 (10.5 if alkalinity is less than 300 ppm)

All limitations are based on composite samples, except for FOG, CN, and pH, which are based on grab samples.

Please refer also to Sections C and D-3 regarding self-monitoring and reporting requirements.

*Daily maximum limitation not finalized, self monitoring is required.

TOTAL TOXIC ORGANIC (TTO)

No.	PARAMETER TOXIC ORGANIC
++++	PURGEABLE COMPOUNDS ++++++++++++++++++++++++++++++
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2	Acrylonitrile
3	Benzene
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8	1,1-Dichloroethane
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14	Tetrachloroethylene
15	Toluene
16	Trichloroethylene
17	Chloroethylene (Vinyl Chloride)
18	1,1-Dichloroethylene
19	1,2-Trans-dichloroethylene
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21	1,3-Dichloropropylene (1,3-Dichloropropene)
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24	Chloromethane (Methyl Chloride)
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34	Acenaphthylene
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40	Bis (2-Ethylhexyl) phthalate
41	Butyl benzyl phthalate
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44	Di-n-octyl phthalate
45	Diethyl phthalate
46	Dimethyl phthalate
47	Fluorene
48	Hexachlorobenzene
49	Hexachlorobutadiene
50	Hexachlorocyclopentadiene
51	Hexachloroethane
52	Isophorone
53	Naphthalene
54	Nitrobenzene
55	N-nitrosodimethylamine

No.	PARAMETER TOXIC ORGANIC
56	N-nitrosodi-n-propylamine
57	N-nitrosodiphenylamine
58	Parachlorometa cresol
59	Pentachlorophenol
60	Phenanthrene
61	Phenol
62	Pyrene
63	1,2,4-Trichlorobenzene
64	2-Chloronaphthalene
65	2,4,6-Trichlorophenol
66	2-Chlorophenol
67	1,2-Benzanthracene (Benzo(a)anthracene)
68	3,4-Benzopyrene (Benzo(a)pyrene)
69	3,4-Benzofluoranthene (Benzo(b)fluoranthene)
70	11,12-Benzofluoranthene (Benzo(k)fluoranthene)
71	1,12-benzoperylene (Benzo(ghi)perylene)
72	1,2,5,6-Dibenzanthracene (Dibenzo(a,h)anthracene)
73	2,3-o-phenylene pyrene (Indeno(1,2,3-cd)pyrene)
74	3,3-Dichlorobenzidine

No.	PARAMETER TOXIC ORGANIC
75	2,4-Dichlorophenol
76	2,4-Dimethylphenol
77	4-Chlorophenyl phenyl ether
78	4-Bromophenyl phenyl ether
79	2-nitrophenol
80	4-Nitrophenol
81	2,4-Dinitrophenol
82	4,6-Dinitro-o-cresol
83	2,4-Dinitrotoluene
84	Aldrin
85	Dieldrin
86	Chlordane (technical mixture and metabolites
87	4,4-DDT
88	4,4-DDE (p,p-DDX)
89	4,4-DDD (p,p-TDE)
90	Alpha-endosulfan
91	Beta-endosulfan
92	2,6-Dinitrotoluene
93	1,2-Diphenylhydrazine

No.	PARAMETER TOXIC ORGANIC
94	Fluoranthene
95	Hexachlorocyclohexane (BHC) (BHC /Heptachlor epoxide)
96	Alpha-BHC
97	Beta-BHC
98	Gamma-BHC
99	Delta-BHC
100	Polychlorinated biphenyls PCB-1242 (Arochlor 1242)
101	PCB-1254 (Arochlor 1254)
102	PCB-1221 (Arochlor 1221)
103	PCB-1232 (Arochlor 1232)
104	PCB-1248 (Arochlor 1248)
105	PCB-1260 (Arochlor 1260)
106	PCB-1016 (Arochlor 1016)
107	Toxaphene
108	2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD)
109	Endosulfan sulfate
110	Endrin
111	Endrin aldehyde
112	Heptachlor

GENERAL TERMS AND CONDITIONS

The permittee shall apply the discharge limits specified in Section B of this permit and shall comply with all provisions of the City of Detroit Wastewater Discharge Control Ordinance, other applicable laws, rules, regulations, user charges and fees established by the City of Detroit without repetition herein.

1) Records for monitoring activities shall be maintained in accordance with ordinance requirements and shall include for all samples:

   a) The date, exact place, time and method of sampling

   b) The names of persons taking the sample

   c) The technique or method of analysis, the date and results of analysis

   d) The names of person performing the analysis

2) NOTIFICATION AND REPORTING REQUIREMENTS

Notification:

Slug Loading / Accidental Discharge:

Within one (1) hour of becoming aware of an accidental discharge entering into the sewer system, the Industrial User (IU) shall telephone Detroit Water and Sewerage Department (DWSD) at the Systems Control Center and inform the Department about the details of the discharge.

Upset at the IU's Pretreatment Facility:

Within twenty four (24) hours of becoming aware of an upset, the IU shall telephone DWSD at the System Control Center and inform the Department about the details of the upset and discharge.

Unanticipated Bypass of IU's Pretreatment Facility:

Within twenty four (24) hours of becoming aware of the bypass, IU shall telephone DWSD at the System Control Center and inform the Department about the details of the discharge.

Submission of Report:

For the above mentioned three incidents, a written report shall be submitted to the Department within five (5) calendar days of becoming aware of the incident. This report shall contain the following information:

i) A description of the discharge and the cause of the incident;

ii) The duration of the incident including exact dates and times or, if not corrected, the anticipated time the incident is expected to continue;

iii) Steps being taken and/or planned to reduce, eliminate and prevent future occurrences of a similar incident.

Anticipated Bypass:

If an IU anticipates the need for a bypass, prior notice shall be submitted to the Department at least ten (10) days, if possible, before the date of bypass. The report shall be accompanied by the analytical data which shows the characteristics of the material to be bypassed. Upon evaluation, the Department will provide the IU with its determination on the bypass.

CONTROL CENTERS

Systems Control Center	224-4775 (24 Hour number)
Wastewater Treatment Plant	297-9000
Industrial Waste Control Office	297-9402

3) LIMITATIONS ON PERMIT TRANSFER

The wastewater discharge permit shall not be reassigned or transferred without the written approval of the City of Detroit Water and Sewerage Department. The permittee shall notify the Department of any such changes thirty (30) days prior to the change.

4) MODIFICATIONS OR REVISIONS OF THE PERMIT

The permittee should notify the Department of any facility or operational changes which may affect the permit.

The terms and conditions of the permit may be subject to modification by the City of Detroit Water and Sewerage Department during the terms of the permit, in accordance with the City's ordinance.

5) CONFIDENTIAL INFORMATION

Except for data accepted by the City as confidential under the City ordinance, all information and data on the permittee obtained from written reports, questionnaires, permit applications, permits, monitoring programs and inspections shall be available to the public or other government agencies without restriction.

6) LEGAL ACTIONS (Ord. 23-86, Sec. 56-3-66.1(f))

a) Any user who violates any provision of Ordinance 23-86, including the failure to pay any fees, charges, or surcharges imposed hereby, or any condition or limitation of a permit issued pursuant thereto or who knowingly makes any false statements, representation, or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to this ordinance or wastewater discharge permit or who tampers with, or knowingly renders inaccurate any monitoring device required under this ordinance is guilty of a misdemeanor and shall, upon conviction, be punished by a fine not to exceed $500 for each violation per day or by imprisonment for not more than 90 days or by both.

The Department is hereby authorized to seek, through its counsel, prosecution of criminal charges against any person violating any provision of this ordinance.

b) If any person discharges sewage, industrial wastes, or other wastes into the POTW contrary to the provisions of this ordinance, permit or order issued thereunder, the Director or Board may commence a civil action to enjoin such discharge or to enforce compliance with this ordinance, permit or order issued thereunder, in the Circuit Court for the County of Wayne or other appropriate court. Upon a proper showing of a violation of this ordinance, permit or order issued thereunder, a permanent or temporary injunction may be granted without bond. The Department or Board may also seek additional legal and/or equitable relief.

Instituting suit in the Circuit Court does not constitute as exclusive election of remedies and does not prohibit the Department, Director, Board, or City of Detroit from commencing action in Federal Court for discharges believed to be in violation of this ordinance, State and Federal requirements pursuant to the Clean Water Act, the City's NPDES permit, or other applicable laws or requirements.

The City of Detroit may also recover reasonable attorney fees, court costs, court reporters fees, and other unusual expenses related to enforcement activities or litigation against the person found to have violated this ordinance or the orders, rules, regulations, and permits issued hereunder.

c) All fines, costs and penalties which are imposed by any court of competent jurisdiction shall be payable to the clerk of such court, who shall deposit the same with the City Treasurer, all of which fines, costs, and penalties shall be credited to the appropriate fund of the Water and Sewerage Department.

7) All reports shall be address to:

Detroit Water and Sewerage Department
Industrial Waste Control
303 S. Livernois
Detroit, Michigan 48209

Attention: IPP Section

RESPONSE ITEM 1

WAYNE COUNTY

Edward H. McNamara
County Executive

RESPONSE ITEM(S)
1

GENERAL DISCRIPTION
RE: PROCESS SYSTEM

June 14, 1995

Mr. Vasilios C. Madias
President
Sybill, Incorporated
111 Military Avenue
Detroit, Michigan 48209

SUBJECT: PERMIT CONDITIONS - AGREEMENT BY COUNTER SIGNATURE

PERMIT NUMBERS: C-10504 THROUGH C-10519
SOURCE DESCRIPTION: INSTALLATION OF SEVEN NON-HAZARDOUS LIQUID WASTE PROCESSING TANKS (NO. 9, 11, 12, 14, 15, 16 & 17), TWO PRODUCT OIL STORAGE TANKS (NO. 1 & 2) WITH ACTIVATED CARBON CANNISTERS, TWO INCOMING WASTE OIL STORAGE TANKS (NO. 3 & 4) WITH ACTIVATED CARBON CANNISTERS, ONE BUFFER STORAGE TANK NO. 10 WITH ACTIVATED CARBON CANNISTER, WASTE WATER STORAGE TANK NO. 5 (CLARIFIER), TWO VENTURI SCRUBBERS (NO. 1 & 2), A PACKED BED CAUSTIC SCRUBBER, AND TWO PARALLEL ACTIVATED CARBON ADSORBERS
SOURCE LOCATION: 111 MILITARY AVENUE, DETROIT

Dear Mr. Madias:

This letter of permit conditions supersedes the letter of conditions dated December 12, 1994.

We have completed our review of the installation permit applications for compliance with all applicable Federal, State and Wayne County air pollution control regulations, rules and ordinances. We shall approve these permit applications subject to the following general conditions and with written concurrence by your organization with the following special conditions. Your written concurrence signifies your acknowledgement of and agreement to the special conditions.

GENERAL CONDITIONS

1. Not more than 30 days after completion of the installation, the applicant shall apply, in writing, for a Certificate of Operation. Written application should be sent to: Director of Enforcement Services, Wayne County Department of Environment, Air Quality Management Division, 640 Temple Street, Suite 700, Detroit, Michigan 48201-2558.

2. Trial operation of this emission source shall be allowed for 90 days, provided such operation is in compliance with all of the terms and conditions contained in the installation permit. If a Certificate of Operation has not been issued for an emission source prior to the expiration of the trial operation period, an extension of trial operation may be requested of the Division Director.

3. Operation of the emission source shall permanently cease upon denial of the Certificate of Operation by this Division. Denial of a Certificate of Operation is an appealable action pursuant to Section 1401(A) of the Wayne County Air Pollution Control Ordinance, hereinafter "Ordinance", as amended.

4. The applicant shall demonstrate compliance with all Ordinance requirements, other applicable State and Federal air pollution regulation requirements, and with all general and special conditions of this permit prior to the issuance of the Certificate of Operation.

5. The applicant shall not reconstruct, alter, modify, expand or relocate this emission source unless plans, specifications and an application for an installation permit are submitted to and approved by this Division.

6. No emission source shall be operated for any other purpose or in any other manner than that for which the installation permit was approved and for which a Certificate of Operation has been issued unless otherwise authorized in writing by the Division. Such emission source shall also be maintained in a state of good repair to ensure compliance with all Ordinance requirements, other applicable State and Federal air pollution regulation requirements, and with all general and special conditions of this permit.

7. Operation of this emission source shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value or property, or which causes unreasonable interference with the comfortable enjoyment of life and property.

8. Operation of this emission source shall not interfere with the attainment or maintenance of the air quality standard for any air contaminant.

9. Operation of this emission source shall not result in significant deterioration of air quality.

10. The applicant shall provide notification of any abnormal conditions or malfunction of process or control equipment covered by this application, resulting in emissions in violation of the Ordinance or of any permit conditions for more than two hours, to the Enforcement Section of this Division. Such notice shall be made as soon as reasonably possible, but not later than 9:00 a.m. of the next working day. The applicant shall also, within 10 days, submit to the Enforcement Section of this Division a written detailed report, including probable causes, duration of violation, remedial action taken and the steps which are being undertaken to prevent a reoccurrence.

11. Approval of this application does not preclude the applicant from complying with any future regulations which may be promulgated.

12. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

13. Act No. 53 - Applicant shall notify any public utility of any excavation, tunneling and discharging of explosives or demolition of buildings which may affect said utility's facilities in accordance with Act 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws and comply with each of the requirements of that Act.

14. The restrictions and conditions of this installation permit shall apply to any person or legal entity which now or shall hereafter own or operate the emission source for which this installation permit is issued. Any new owner or operator shall immediately notify the Director of the Enforcement Section, in writing, of such change in ownership or principal operator status of this emission source.

15. If the installation, reconstruction, relocation or alteration of the emission source for which this permit has been approved has not commenced within, or has been interrupted for, 18 consecutive months, this permit shall be revoked in writing, with the notice of revocation sent to the applicant by certified mail, unless otherwise authorized by this Division.

16. Except as allowed by Michigan Public Act 451 of 1994, Part 55 Air Pollution Control, Administrative Rule 285 (a), (b), and (c), applicant shall not substitute any fuels, coatings, or raw materials for those described in the application and allowed by this permit, nor make changes to the process or process equipment described in the application, without prior notification to and approval by this Division.

SPECIAL CONDITIONS

17. Applicant shall not receive or process any hazardous wastes, as outlined in the Code of Federal Regulations, Title 40, Part 261, Subparts C and D, nor any hazardous wastes, as outlined in the Michigan Act 451 of 1994, Part III Hazardous Waste Management.

18. Applicant shall not receive any waste oil stream with a volatile organic compound (VOC) content greater than 0.15 percent by weight (1,500 ppm) nor any detectable level of polychlorinated biphenyl (PCB), as determined by a test method acceptable to the Division. Analyses of the incoming waste streams (including VOC, PCB, & reactive sulfur) shall be kept on record for a period of at least two years following the date of such record and made available to the Division upon request.

19. The total amount of non-hazardous wastes received at the applicant's facilities at 111 Military, Detroit, shall not exceed 280,000 gallons per calendar day.

20. Dampers in the exhaust duct from any tanks shall be in the closed position during cleaning and maintenance of those tanks. All tank openings such as manways and hatches shall be kept closed, except during cleaning and maintenance of the tanks.

21. On and after June 15, 1995, applicant shall not process any waste oil unless the venturi scrubber Nos. 1 and 2, the packed bed caustic scrubber, and the activated carbon adsorption units, hereinafter "control system", are installed and operating properly.

22. Visible emissions from the waste storage tanks, process tanks, and the control system shall not exceed zero percent opacity.

23. The exhaust gases from the control system shall be discharged, unobstructed vertically upwards to the ambient air from a stack with a maximum diameter of 36 inches at an exit point not less than 124 feet above ground level.

24. The hydrogen sulfide (H_2S) emissions from the control system shall not exceed 0.43 milligrams per cubic meter of exhaust air nor 6.5×10^{-5} pound per hour.

25. The total VOC emissions from the control system shall not exceed 0.01 pound per hour nor 103 pounds per year.

26. Odor emissions from the control system shall not exceed 50 odor units per cubic foot of exhaust gas.

27. Within the period from June 15, 1995 through September 15, 1995, verification of the emissions specified in the special conditions 24 and 25, from the control system, by testing, at owner's expense, in accordance with test methods outlined in the Code of Federal Regulations, Title 40, Part 60, Appendix A, shall be required for operating approval. All tests shall be performed in a manner representative of worst case actual operating conditions. Verification of emissions includes the submittal of a complete report of the test results. No less than 30 days prior to the testing, a complete stack testing plan shall be submitted to the Director of Enforcement Services of the Division. The final plan must be approved by the Division prior to testing.

28. Within the period from June 15, 1995 through September 15, 1995, verification of the emissions specified in the special condition 26, from the control system, by testing, at owner's expense, in accordance with the modified ASTM syringe method D-1391, shall be required for operating approval. All tests shall be performed in a manner representative of worst case actual operating conditions. Verification of emissions includes the submittal of a complete report of the test results. No less than 30 days prior to the testing, a complete stack testing plan shall be submitted to the Director of Enforcement Services of the Division. The final plan must be approved by the Division prior to testing.

29. After a determination by and a written notification letter from the Division Director that emissions from the facility are causing unreasonable interference with the common public right to live free from foul or noxious odors, the applicant shall have an opportunity to meet with the Division to propose a plan of action to abate the odor problem. The scheduled meeting should be held within 10 days of the sending of the Division Director's notification letter. The applicant shall then have 20 additional days to submit to the Division and to implement an acceptable odor abatement program for permanent resolution of the odor problem. Nothing in this condition shall be considered to diminish the Division's rights to pursue other enforcement actions permitted by law.

30. The Division reserves the authority to conduct or require any reasonable odor testing or other pollutant testing (in accordance with the Michigan Act 451 of 1994, Part 55 Air Pollution Control, Administrative Rules 336.2001 and 336.2002) at the waste oil treatment tanks, storage tanks, and control system at the owner's expense. Any required test shall be performed within 60 days following the receipt of written notification from the Division, unless otherwise authorized by the Division, utilizing methods acceptable to this Division (Rule 336.2003) and with prior Division approval. Also, in

accordance with the Michigan Act 451, Part 55 Air Pollution Control, Section 16a, the Division reserves the authority to sample or monitor at reasonable times, inspect any equipment, have access to and copy records for compliance.

31. Temperature of the waste material in the oil processing Tank Nos. 9, 11, 12, 14, 15, 16, and 17 shall not exceed 200° Fahrenheit.

32. The acidification of waste material shall only be done in process Tank Nos. 9 and 14, and shall only be done in accordance with methods, procedures, and specifications accepted by the Division, in writing.

33. By March 30, 1995, applicant shall install and maintain permanent covers on product storage Tank Nos. 3 and 4 so as to prevent odor emissions to the ambient air. The tanks shall be vented to the control system or alternative stand-alone control acceptable to the Division by June 15, 1995.

34. Applicant shall only use Tank No. 5 (waste water clarifier tank) for storage of treated waste water, which is ready to be discharged to the municipal sewer systems. If Tank No.5 creates any odor nuisance, then it shall be equipped with a fixed cover and the emissions shall be vented to the control system within 90 days of notification from the Division.

35. Applicant shall maintain a minimum water flow rate of 100 gallons per minute at a pressure no less than 100 pounds per square inch (psig), to the venturi scrubber Nos. 1 and 2. The venturi scrubbers shall be equipped with a flow meter to verify the water flow rate.

36. Exhaust air flow rate from the packed bed caustic scrubber shall not exceed 6,000 cubic feet per minute.

37. The packed bed caustic scrubber liquid circulation rate shall be a minimum of 85 gallons per minute. The packed bed caustic scrubber shall be equipped with a flow meter to verify this circulation rate.

38. The packed bed caustic scrubber shall be filled with 2.75 inch size TELPAC polypropylene packing medium in a packing bed with minimum dimensions of 4 feet 6 inches in diameter and 6 feet in depth.

39. Exhaust gas temperature from the packed bed caustic scrubber shall not exceed 105° Fahrenheit.

40. The hydrogen sulfide concentration in the influent gases to the packed bed caustic scrubber shall not exceed 0.61 percent by volume on a wet basis.

41. The temperature of the influent gases to the packed bed caustic scrubber shall not exceed 180° Fahrenheit.

42. The packed bed caustic scrubber shall maintain a minimum H_2S control efficiency of 99 percent or as required in condition 24.

43. Applicant shall measure the wet-bulb and dry-bulb temperatures of the influent gases to the packed bed caustic scrubber with instrumentation acceptable to the Division. Water vapor content in the influent gases to the packed bed caustic scrubber shall not exceed 6 percent by volume. Analysis of the moisture content of the influent gases to the packed bed caustic scrubber shall be performed and recorded once per hour until such time as the applicant demonstrates, using at least 120 days actual operating data, that the analysis done once per day is sufficient for proper operation of the packed bed caustic scrubber. With Division approval of this demonstration, the analysis shall be performed and recorded at least once per operating day instead of once per hour.

44. An automatic feed system shall be utilized for caustic addition to the packed bed caustic scrubber solution, which shall maintain a feed rate of 1.05 gallons per minute of 50 percent by weight caustic solution, or equivalent quantity and strength.

45. Fresh water make-up to the packed bed caustic scrubber shall be supplied at a rate sufficient to maintain a constant liquid level in the packed bed caustic scrubber reservoir, while maintaining a continuous, minimum scrubbing solution blowdown (purge) directly to the municipal sewer systems, at a rate of 7.5 gallons per minute. Such blowdown rate shall be measured on a continuous basis with, instrumentation acceptable to the Division.

46. The carbon adsorbers shall maintain a minimum VOC control efficiency of 99 percent or as required in condition 25.

47. Applicant shall equip and maintain each carbon adsorber with a monitor capable of detecting breakthrough of the carbon.

48. Applicant shall monitor each carbon adsorber for breakthrough, at least once every day, and shall immediately replace the spent carbon adsorber if breakthrough is detected or direct all the emissions through the optional (stand-by) carbon adsorber units. If stand-by carbon adsorber units are not available, then applicant shall cease all operations as soon as possible, consistent with safe operating practices, until the carbon adsorption units are replaced with fresh carbon.

49. Applicant shall keep a written log of the time and date of carbon adsorber replacement for a period of at least two years following the date of such record. This information shall be made available to the Division upon request.

50. A written log shall be kept, with two entries during one operating shift (at an interval of six hours), of the inlet and outlet gas stream temperatures, the inlet and outlet circulating absorbent liquid temperatures in the packed bed caustic scrubber, and the packed bed caustic scrubber solution blowdown rate. This log shall be kept on file for a period of at least two years following the date of such record and shall be made available to the Division upon request.

51. Applicant shall not store any material in the storage Tank Nos. 1, 2, 3, and 4, unless the tanks are sealed completely and the corresponding stand alone activated carbon canisters are installed and operating properly.

52. All the static pressure readings shall be taken once per shift, in a two hour period and a written log shall be kept on file for a period of at least two years following the date of such record, and made available to the Division upon request.

53. Records of the amount and strength of sulfuric acid and sodium hydroxide purchased shall be kept on file for a period of at least two years following the date of such record, and made available to the Division upon request.

54. Pressure drop across venturi scrubber Nos. 1, & 2, the packed bed caustic scrubber, and the carbon adsorber units shall be continuously monitored with instrumentation acceptable to the Division. The pressure drop measurements shall be recorded once per shift and the data shall be kept on file for a period of at least two years following the date of such record, and made available to the Division upon request.

55. Applicant shall keep a written log for each processing tank and storage tank, which shall contain identification of the, waste oil generator, the waste oil processing temperature, the amounts and types of chemicals used in processing, the number of gallons of waste oil treated, the processing time and tank identification on a daily basis. This log shall be kept on file for a period of at least two years following the date of such record, and made available to the Division upon request.

56. Applicant shall comply with all the monitoring requirements, as specified in the special conditions above.

57. Applicant shall permanently affix tank identification numbers on each tank. Tank identification numbers shall be prominently posted on the tanks such that they are clearly visible.

58. A written log of the amount of fuel combusted (in the boiler) on a daily basis shall be kept on file for a period of at least two years following the date of such record and made available to the Division upon request.

59. Applicant shall not process any waste material by way of acidification, unless the control system is installed and operating properly.

60. Applicant shall not process, the contents of Tank Nos. 3 and 4, unless the control system is installed and operating properly.

61. In accordance with the Code of Federal Regulations, Title 40, Part 279, Subpart F (§279.56), a written log of the amount of each used oil shipment accepted (daily basis), shall be kept on file for a period of at least three years following the date of such record and made available to the Division upon request.

62. All the written logs for the entire process as specified above, shall be kept in bound books.

Please indicate written concurrence to these special conditions by signing and dating the confirmation copies of this letter by an authorized representative of your organization and returning both copies to this Division by June 29, 1995, retaining the original for your files. We shall approve these permit applications upon receipt of the signed and dated confirmation copies of this letter.

Thank you for your cooperation in this matter.

Very truly yours,

Rhonda L. Ross
Director

RLR/rp

Enclosures

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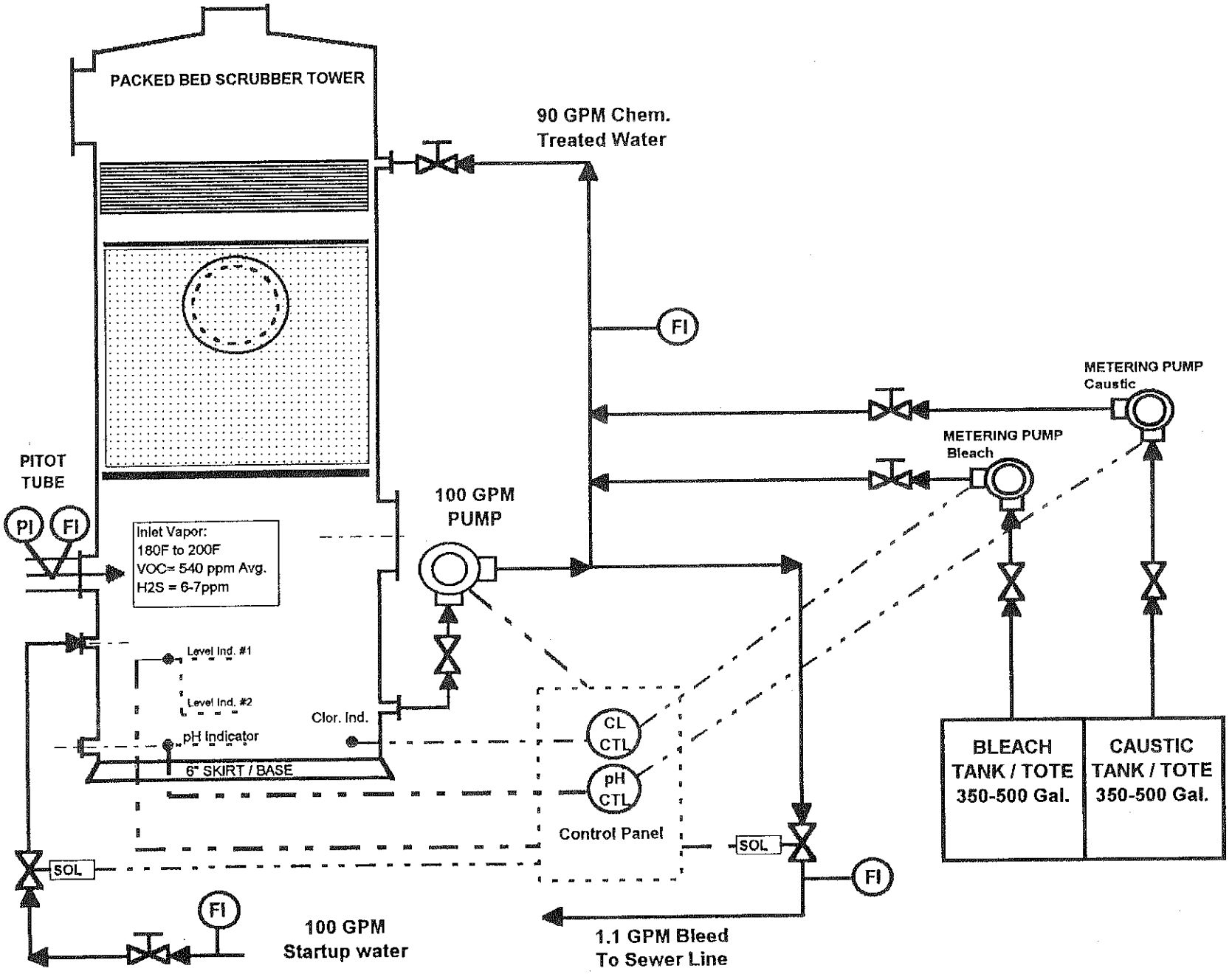
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Caustic
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Bleach
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PI
FI
Inlet Vapor:
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VOC= 540 ppm Avg.
H2S = 6-7ppm
100 GPM
PUMP
Level Ind. #1
Level Ind. #2
pH Indicator
Clor. Ind.
6" SKIRT / BASE
CL
CTL
pH
CTL
Control Panel
SOL
SOL
FI
FI
100 GPM
Startup water
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To Sewer Line
BLEACH
TANK / TOTE
350-500 Gal.
CAUSTIC
TANK / TOTE
350-500 Gal.

RESPONSE ITEM (S) CURRENT "95" PROCESS

SYBILL, Incorporated

PROCESS FLOW DIAGRAM

7/28/95

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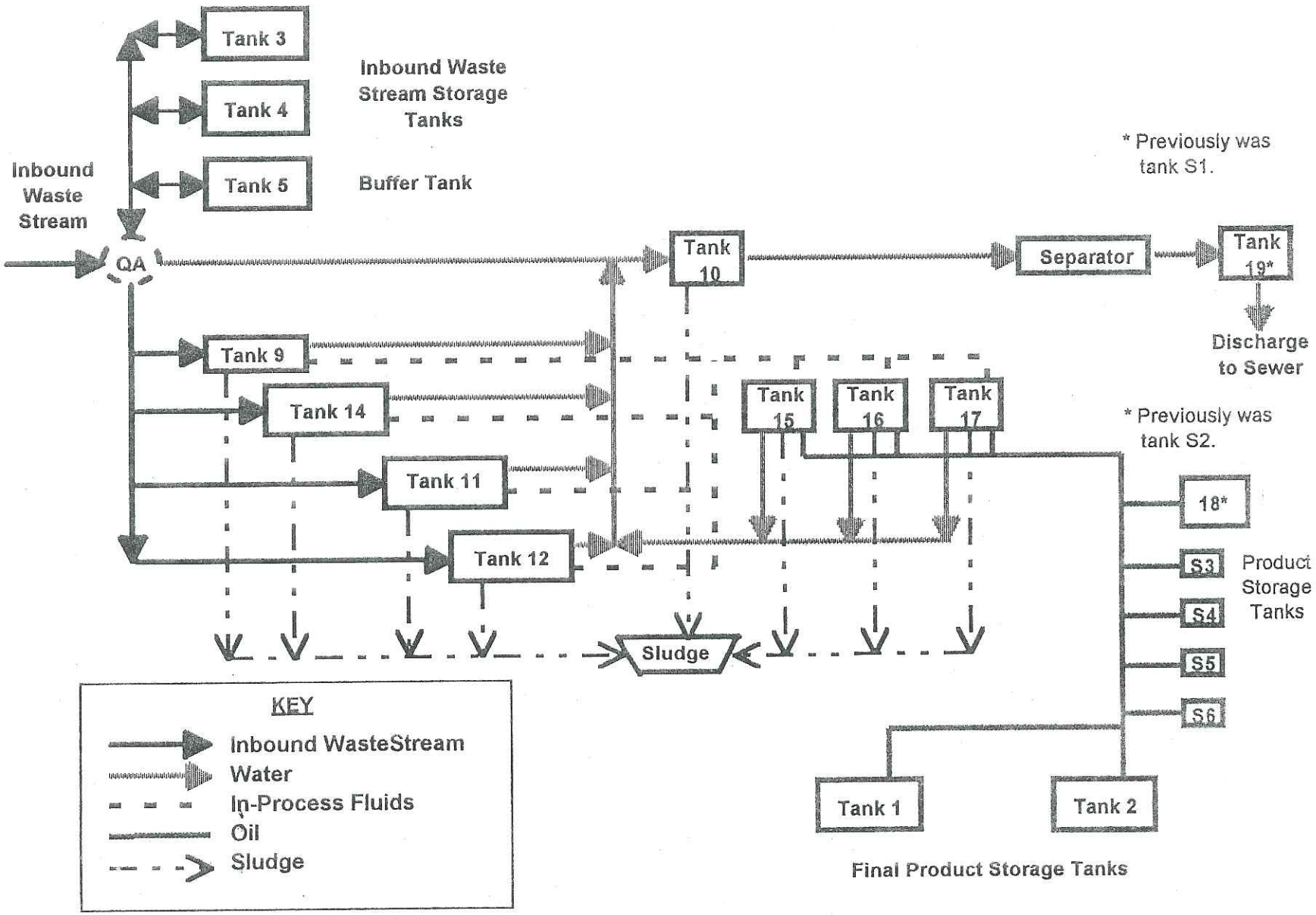


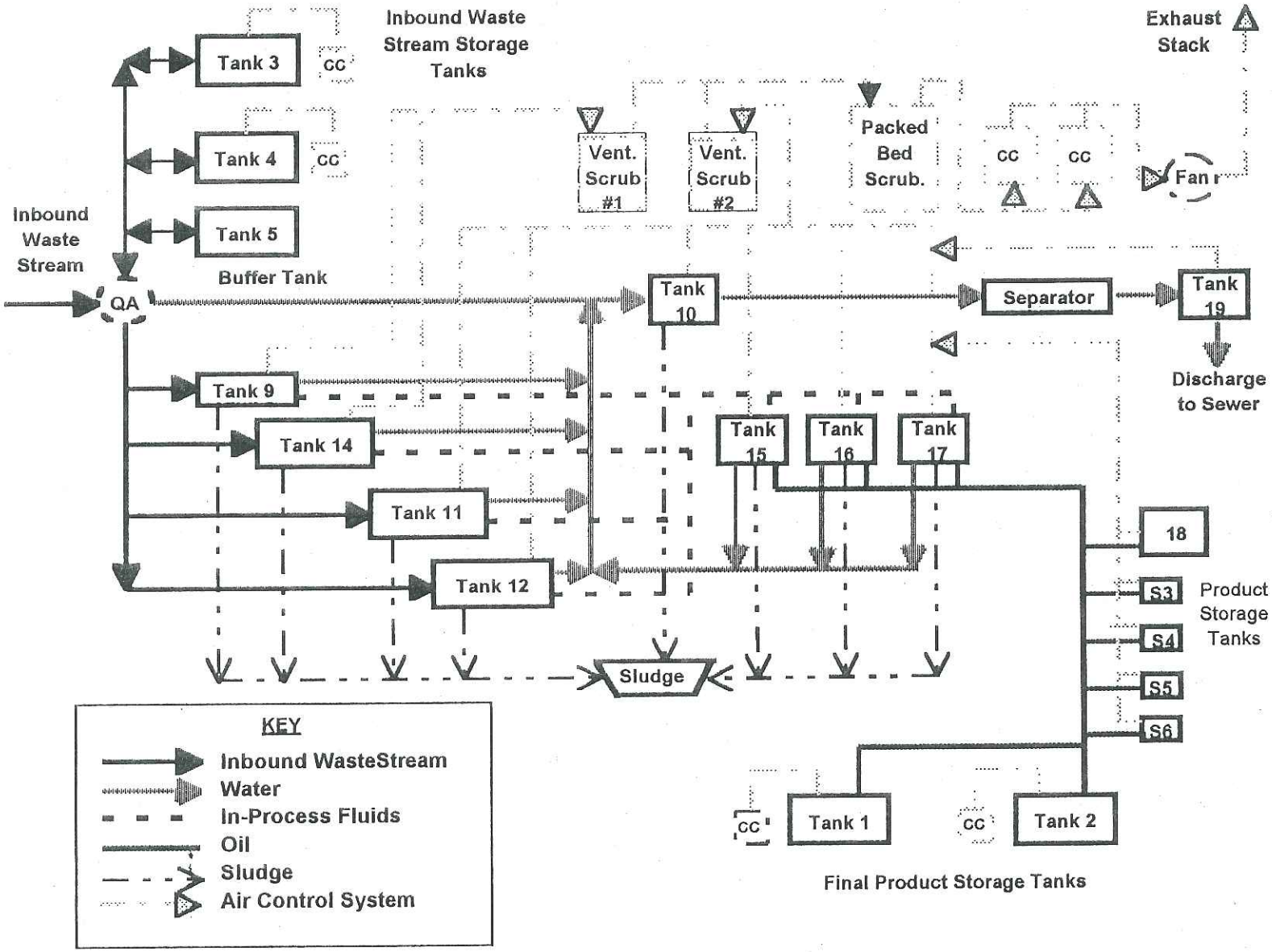
CURRENT AIR "95" CONTROL SYSTEM

SYBILL, Incorporated

PROCESS FLOW DIAGRAM
AIR CONTROL SYSTEM

7/28/95

CONFIDENTIAL



PREVIOUS SYSTEM LAY-OUT

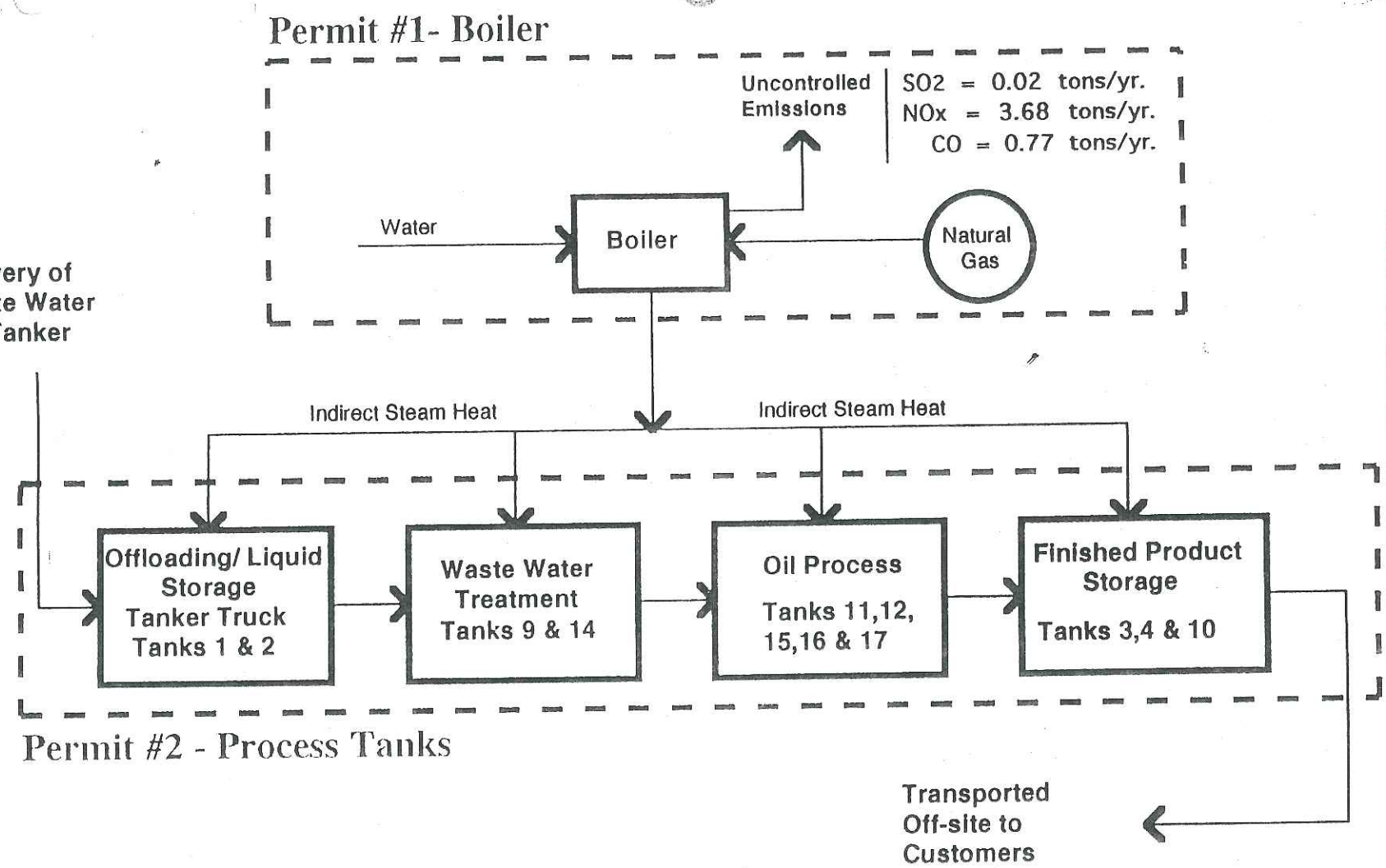


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Diagram 1

Process Flow Diagram

Non-Hazardous Waste Process Tanks
Sybill Facility, Detroit, Michigan

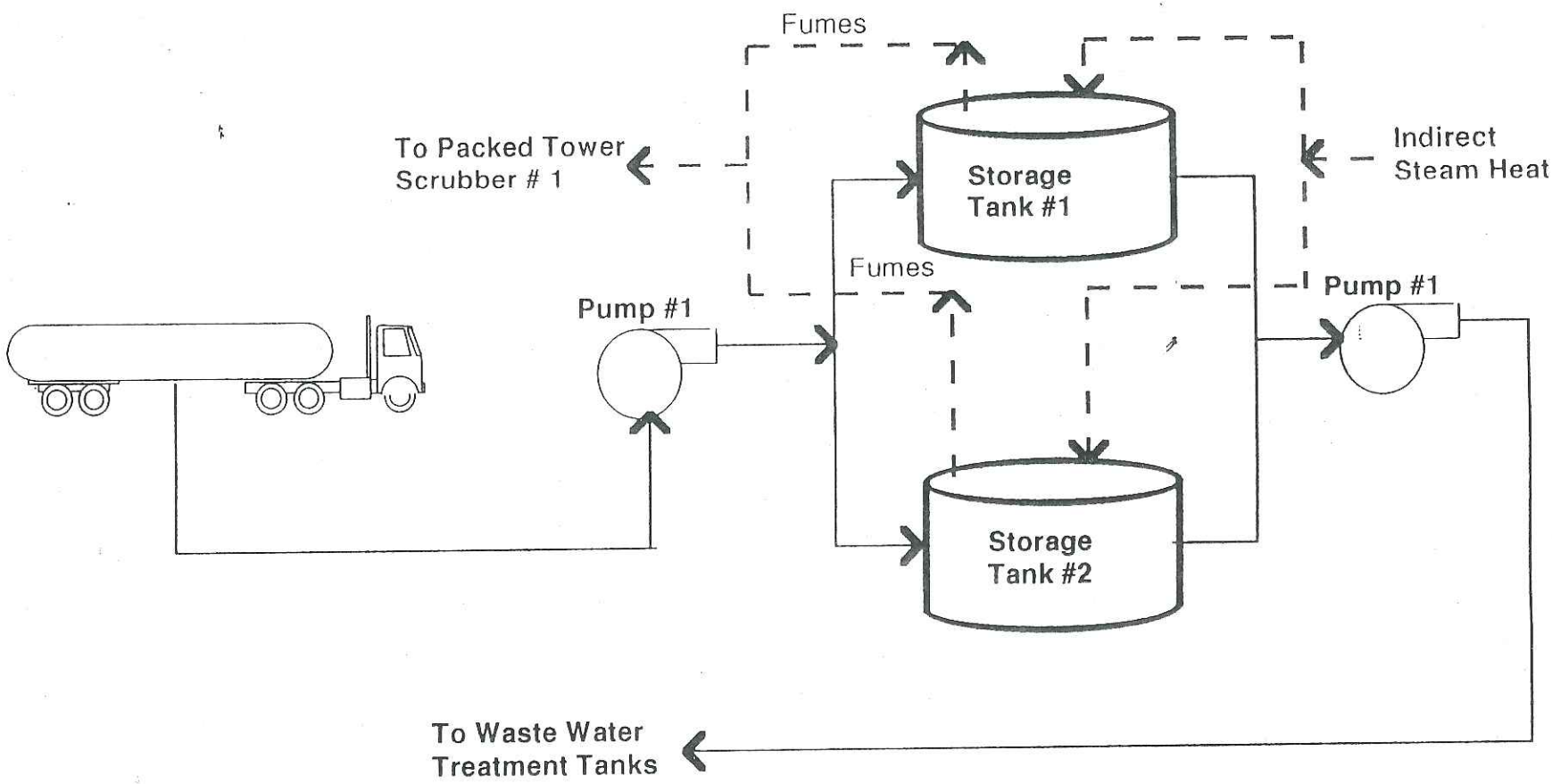

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Diagram 2

Process Flow Diagram

Offloading/Liquid Storage

Sybill Facility, Detroit, Michigan

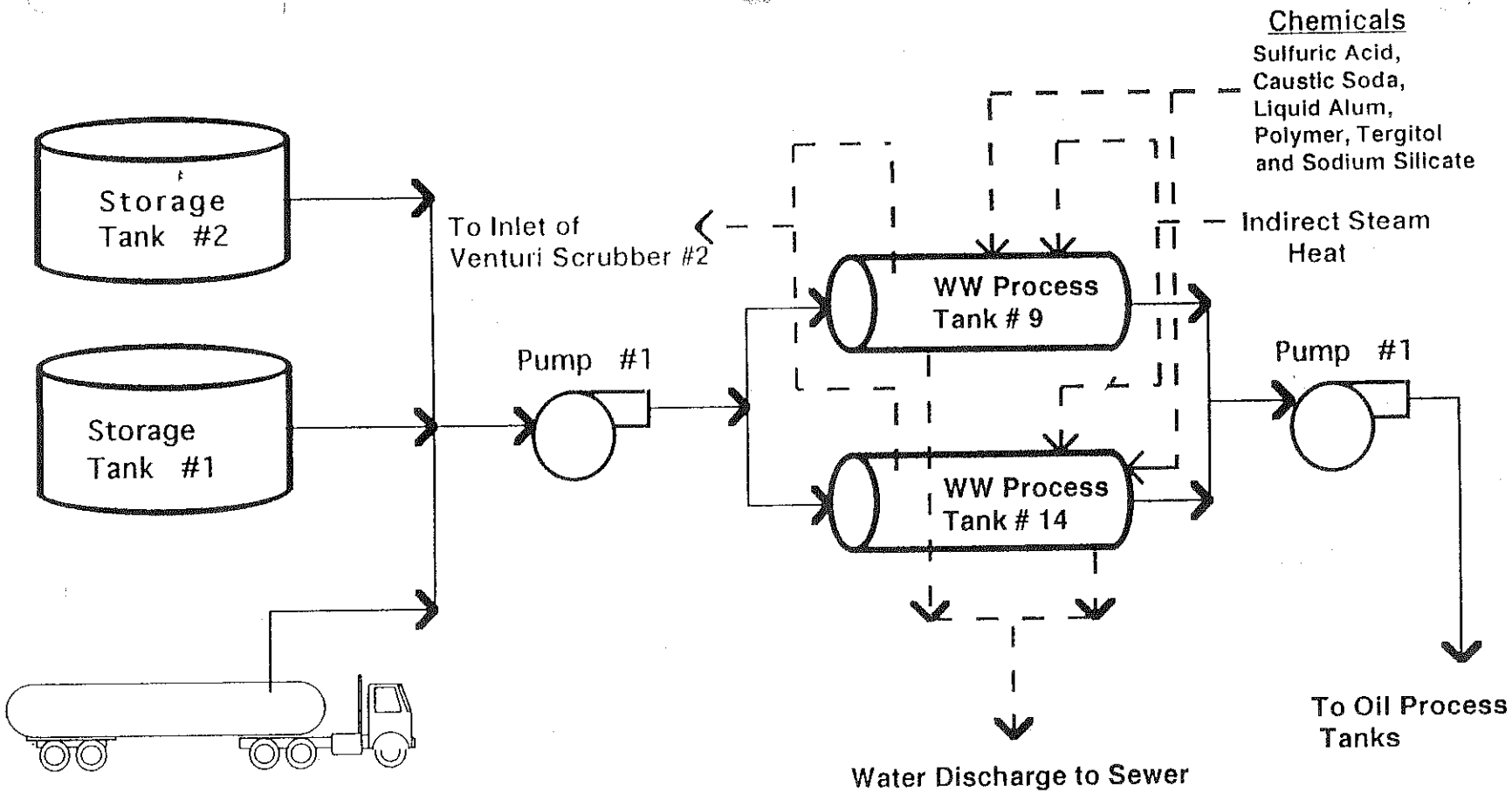

Diagram 3

Process Flow Diagram

Waste Water Treatment Process Tanks

Sybill Facility, Detroit, Michigan

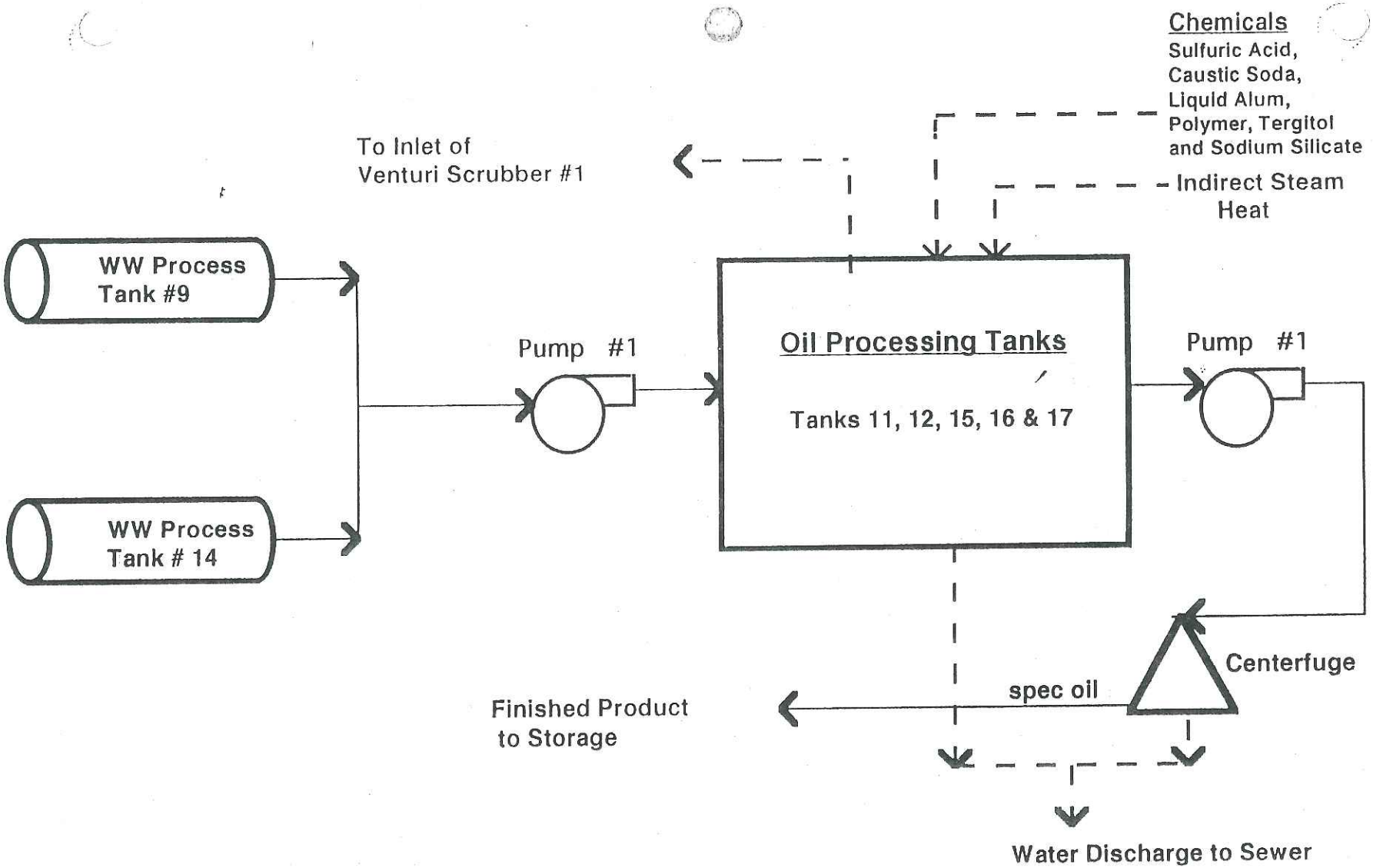

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Diagram 4

Process Flow Diagram

Oil Process Tanks

Sybill Facility, Detroit, Michigan

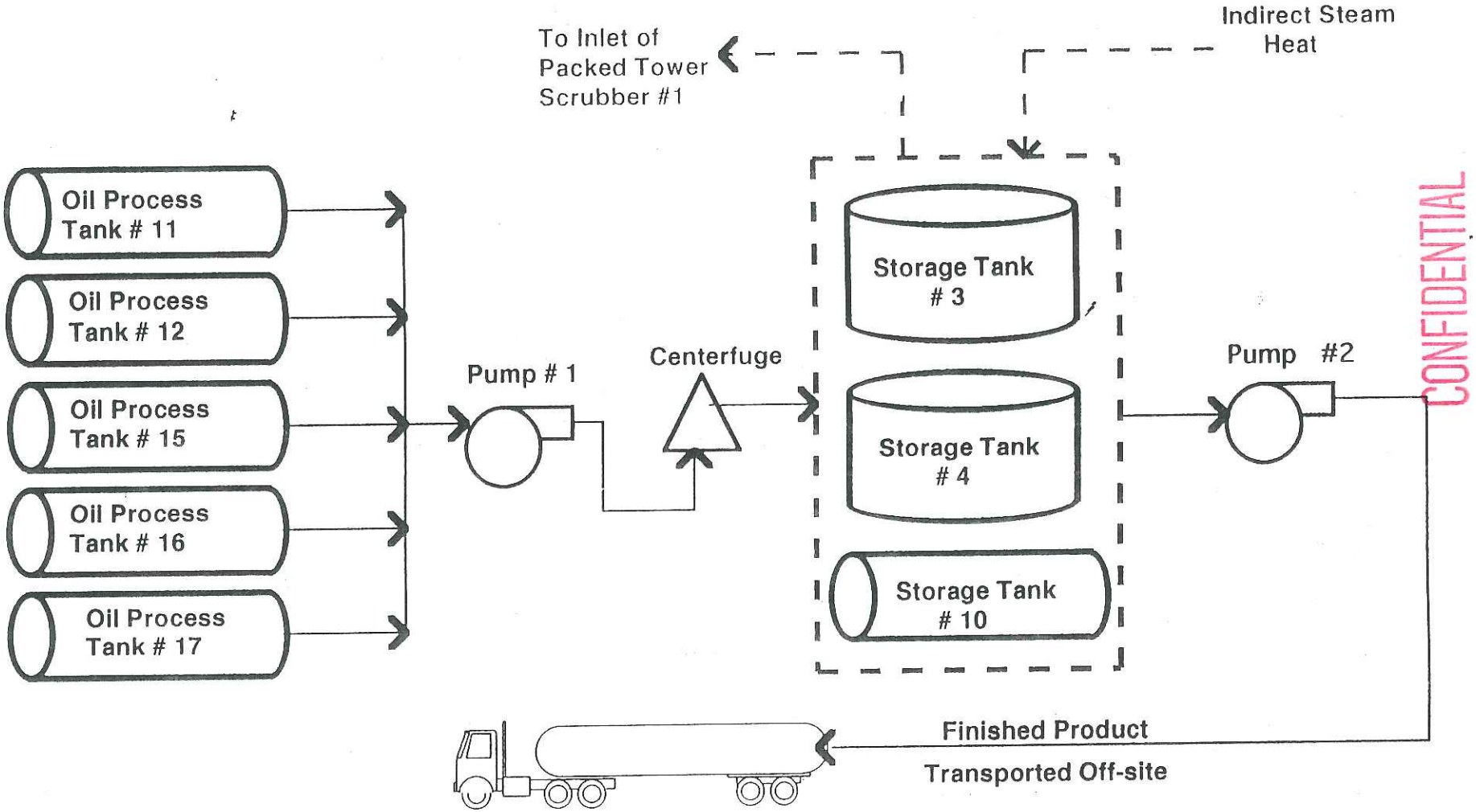

Diagram 5

Process Flow Diagram

Finished Product Storage Tanks
Sybill Facility, Detroit, Michigan

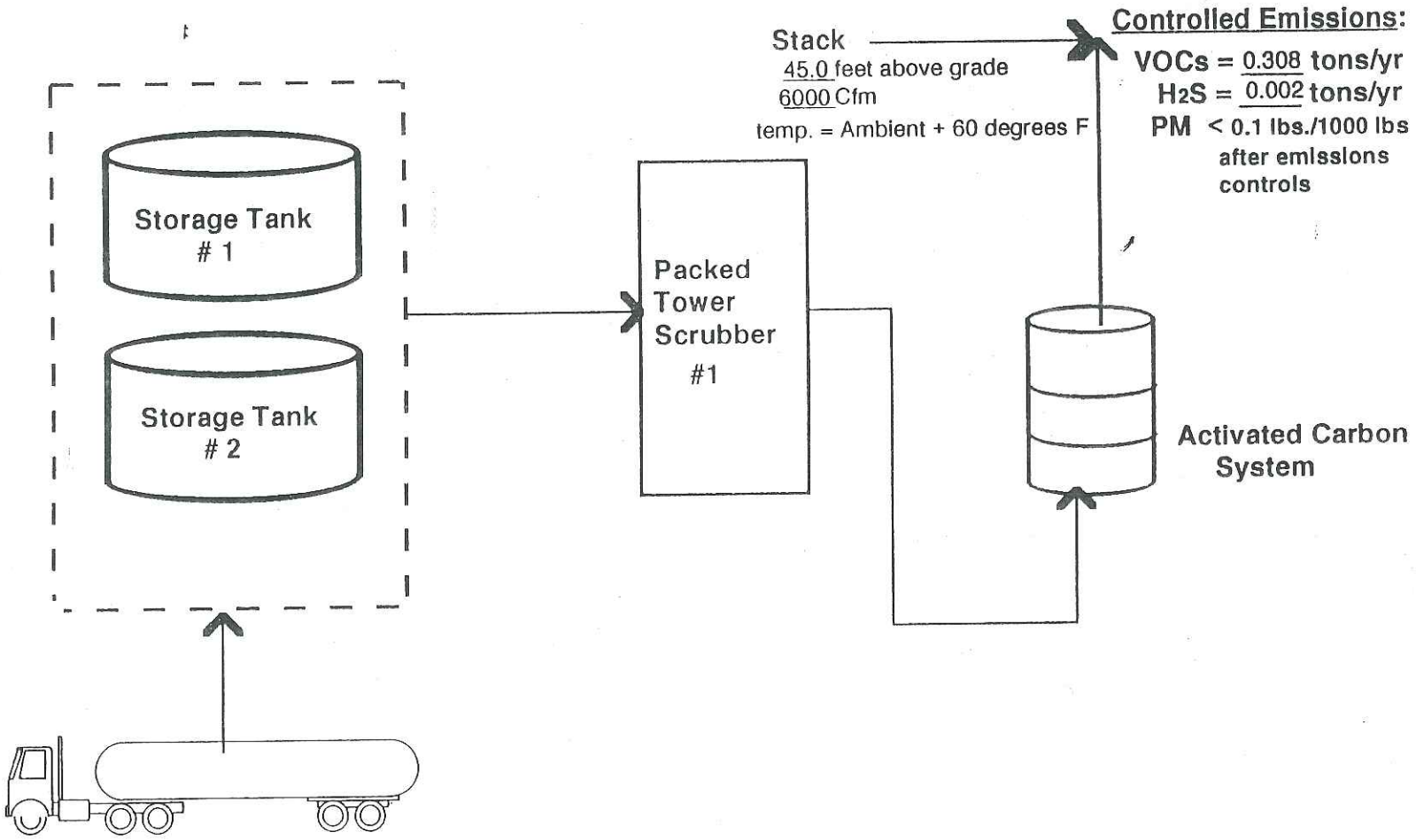

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Diagram 6

Air Contaminant Controls

For Liquid StorageTanks 1 & 2

Sybill Facility, Detroit, Michigann

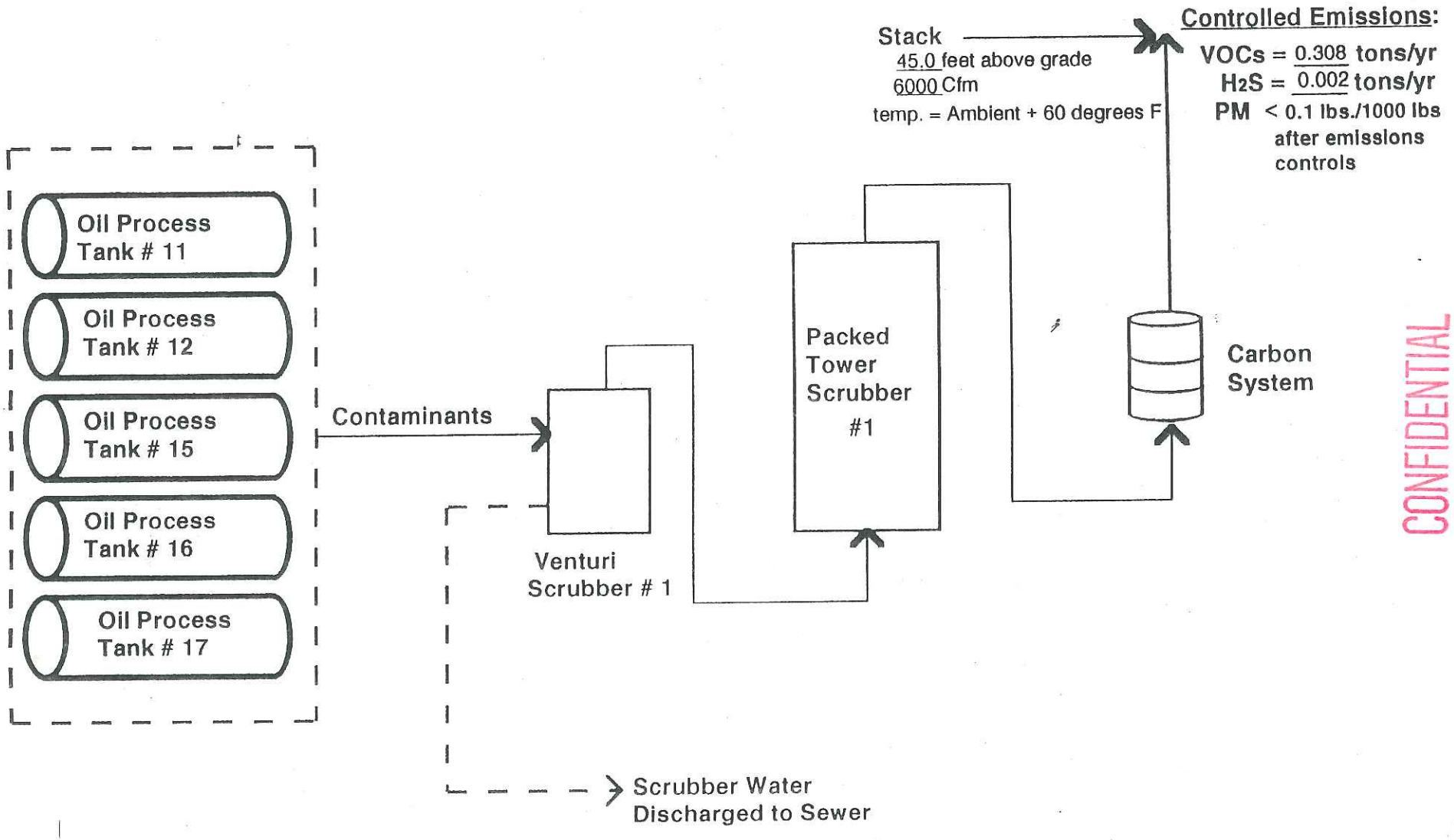

Diagram 7

Air Contaminant Controls

For Process Tanks 11, 12, 15, 16, & 17

Sybill Facility, Detroit, Michigan

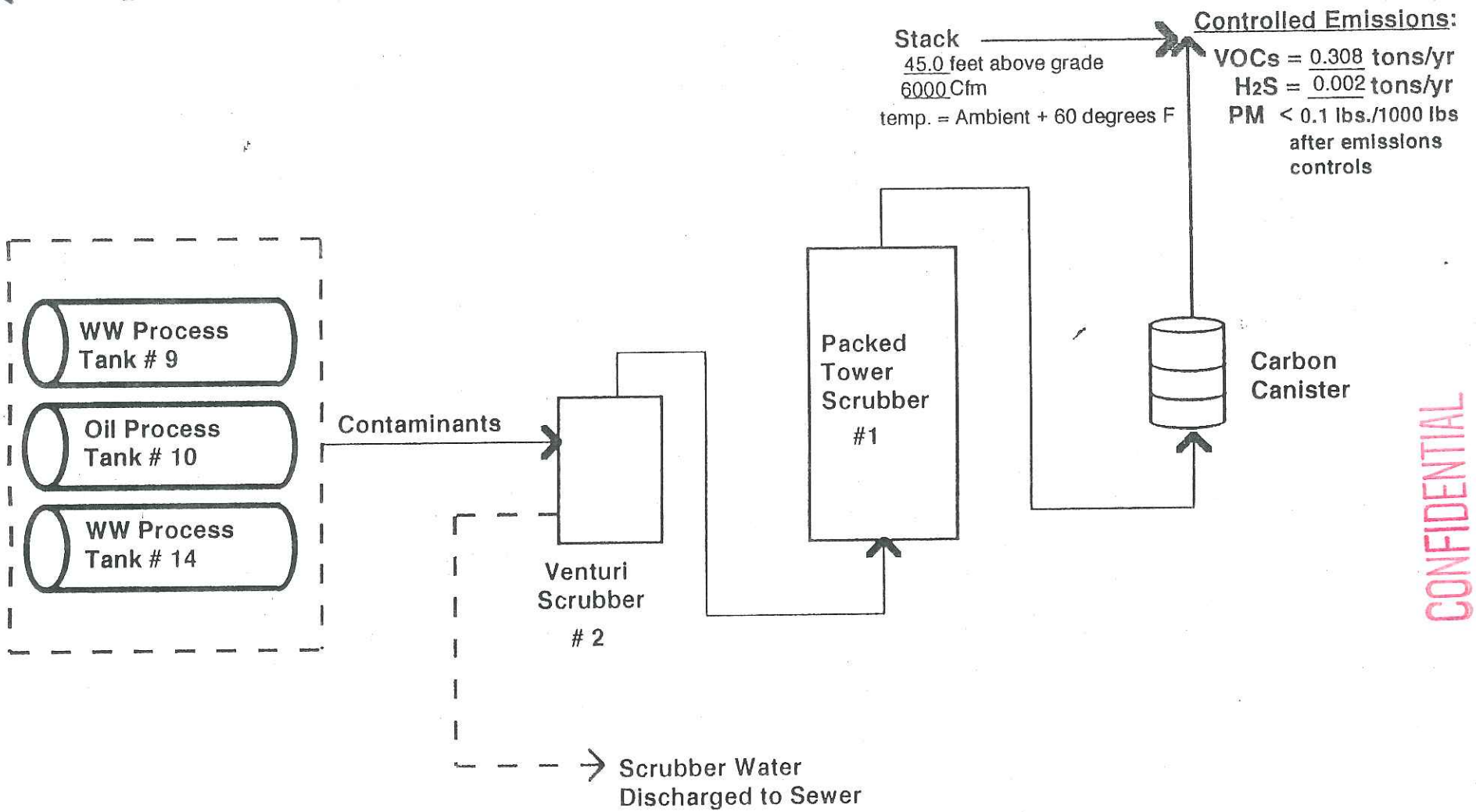

Diagram 8

Air Contaminant Controls

For Process Tanks 9, 10, 14

Sybill Facility, Detroit, Michigan

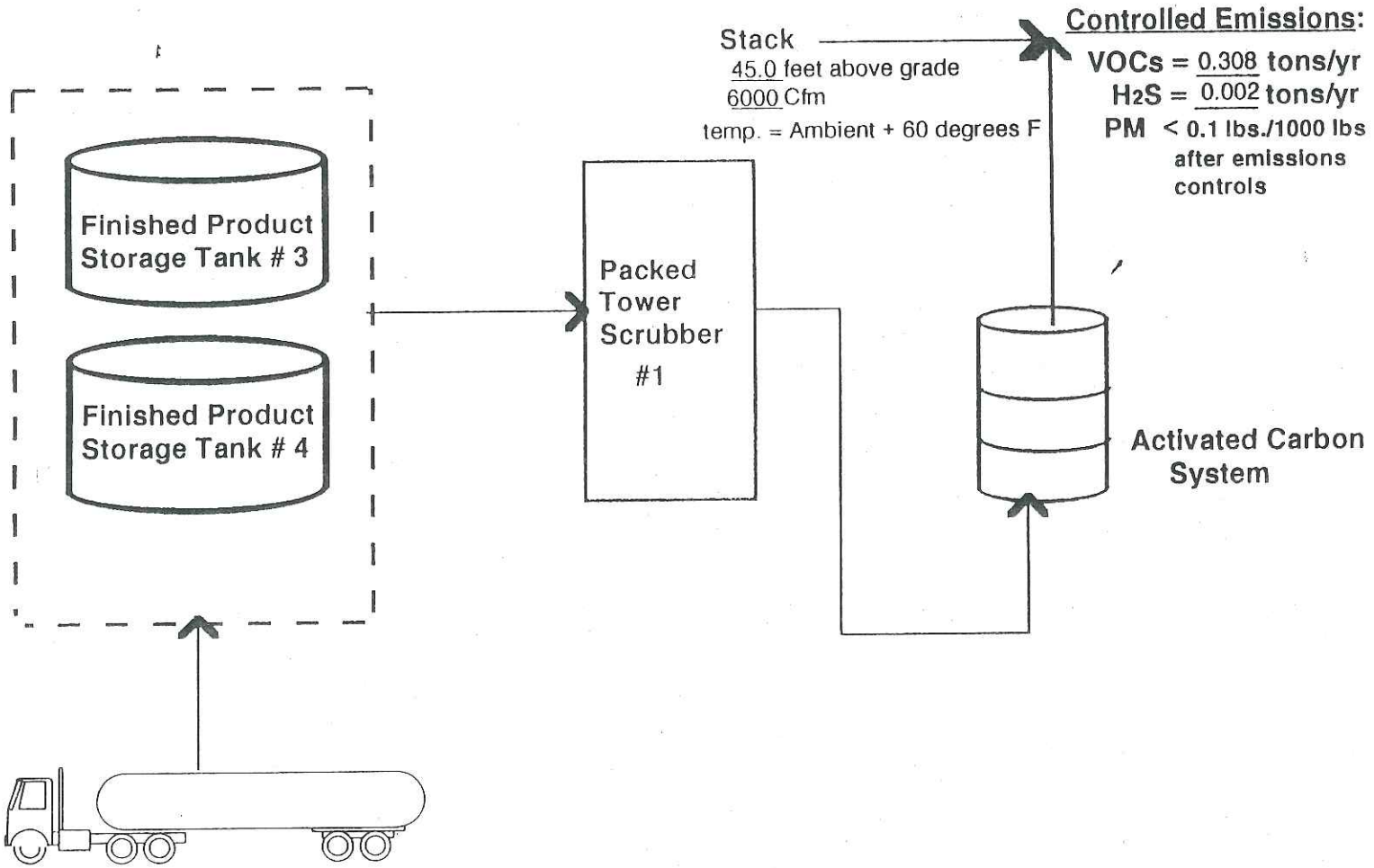

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Diagram 9

Air Contaminant Controls

For Finished Product Storage Tanks 3 & 4

Sybill Facility, Detroit, Michigann

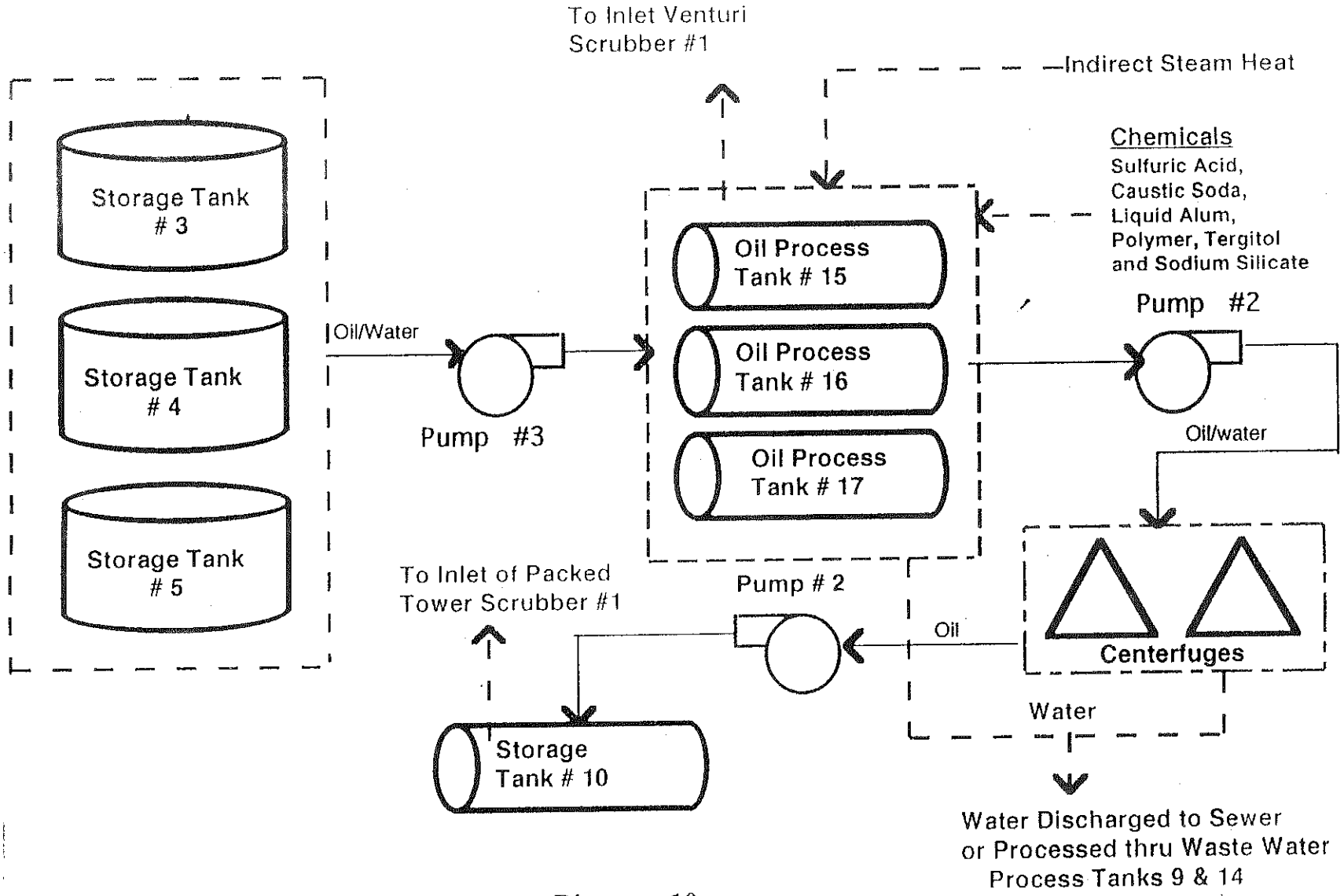
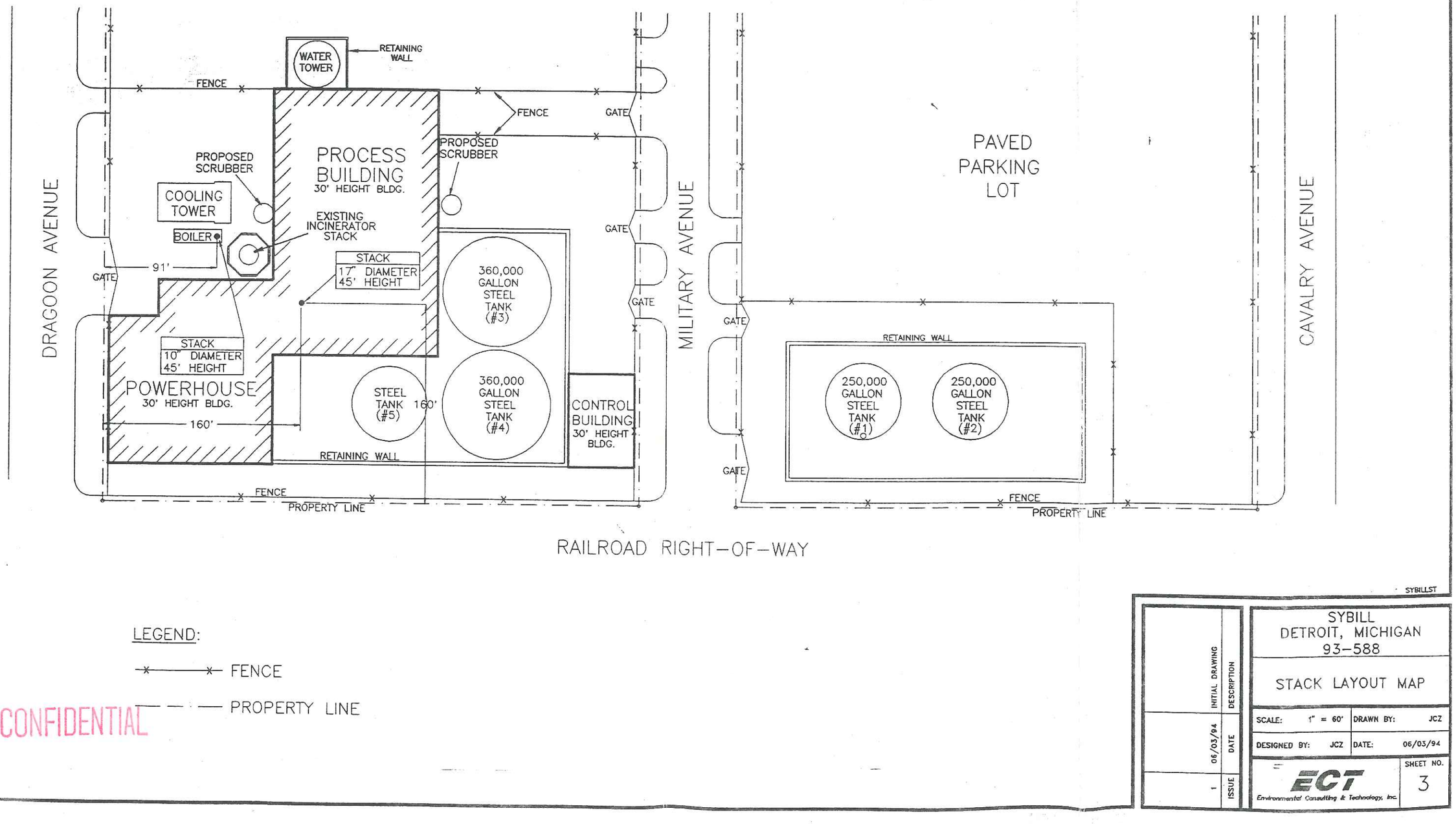


Diagram 10

Process Flow Diagram

For Remediating Contents in Tanks 3, 4 & 5
Sybill Facility, Detroit, Michigann



LEGEND:

FENCE

PROPERTY LINE

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SYBILLST

1	06/03/94	INITIAL DRAWING
ISSUE	DATE	DESCRIPTION

SYBILL
DETROIT, MICHIGAN
93-588

STACK LAYOUT MAP

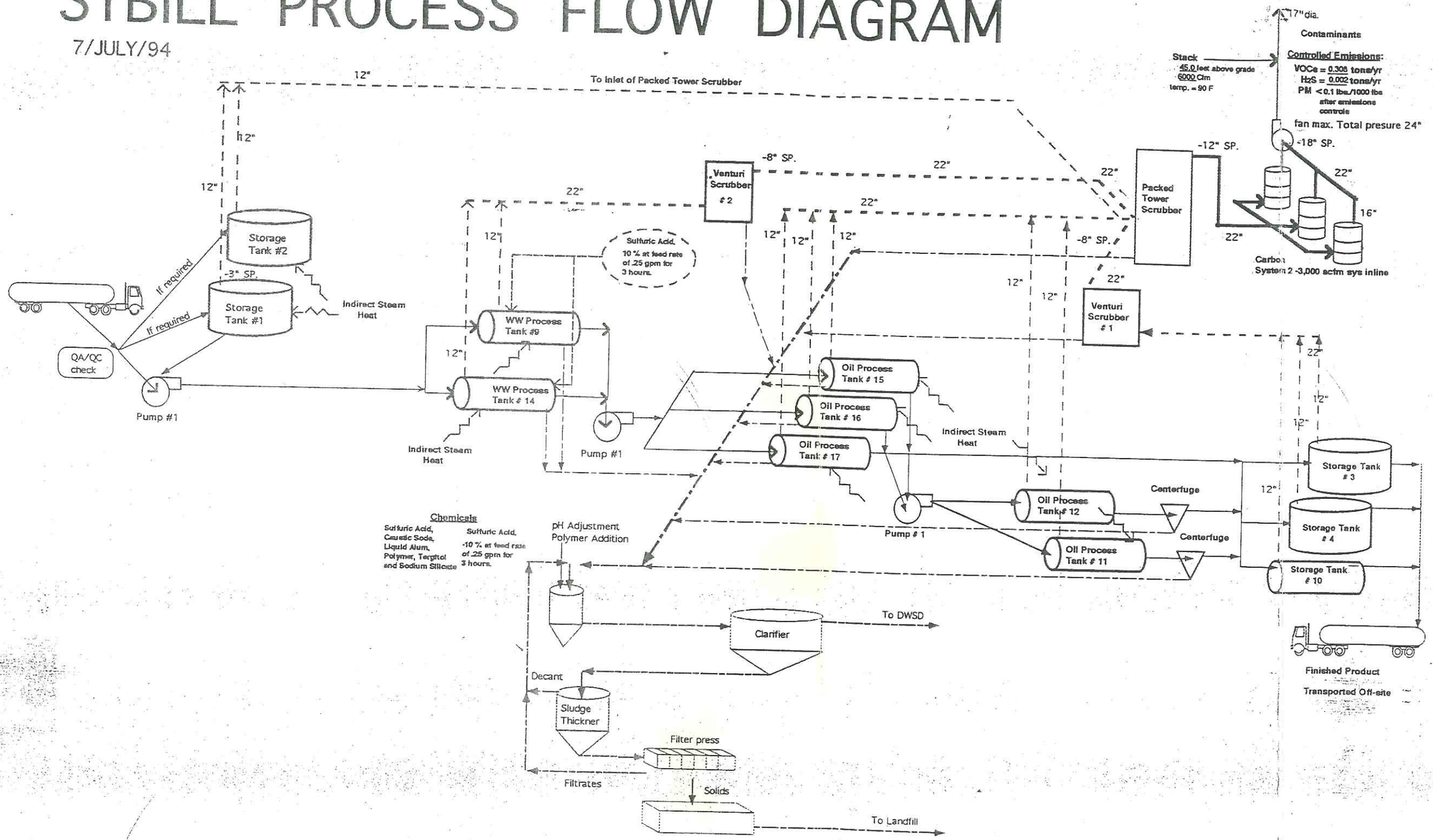
SCALE:	1" = 60'	DRAWN BY:	JCZ
DESIGNED BY:	JCZ	DATE:	06/03/94

ECT Environmental Consulting & Technology, Inc.

SHEET NO. 3

SYBILL PROCESS FLOW DIAGRAM

7/JULY/94



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